

Response to Letter I75**Ray and Ellen Bender**

- I75-1** The County acknowledges the introductory comments. Responses to each of the topics raised are included below in the individual comments.
- I75-2** The County acknowledges the introductory comments. Responses to each of the topics raised are included below in the individual comments.
- I75-3** The County acknowledges this comment; however, since it discusses financial estimates of the Airport and/or Master Plan Update, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I75-4** The County acknowledges this comment; however, since it relates to FAA safety policies and other FAA guidance, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Nonetheless, the County would like to respond to the County-initiated study cited in this comment that was prepared by SCS Engineers dated October 2013. The intent of the study was to understand the theoretical effects of an aircraft collision with the existing inactive landfill underlying portions of the Airport.

The study was commissioned by the County and conducted by the County's on-call landfill management consultant, SCS Engineers. However, after the County received a first draft of the study, staff determined it contained incorrect assumptions of aviation principles and mechanics, and the analyzed conditions were too speculative in nature. In other words, the study did not correctly portray how an aircraft collision would realistically occur. As a result, staff found the draft study did not include an accurate representation of a potential aircraft incident, and the study was discontinued and never finalized.

SCS Engineers' primary function is to conduct ongoing maintenance, monitoring, and reporting of the inactive landfill. While SCS Engineers has more than seventeen years of experience in managing the onsite inactive landfill and assisting the County to meet its regulatory requirements, SCS Engineers does not possess aviation technical expertise, which the County acknowledges is needed to properly understand aviation principles and mechanics. The study further states that the possibility of such an aircraft collision occurring is beyond the scope of the study, and SCS Engineers did not evaluate actual conditions in which aircraft approach or depart the Airport (i.e., glide paths and glide slope).

Furthermore, although SCS Engineers continues to provide the County with satisfactory services to maintain and monitor the inactive landfill, their ability to analyze aviation principles and mechanics should have been considered when the task was scoped. As such, the County acknowledges the scope of work could have been more accurately

defined. The County believes the assigned task required further guidance from staff during its development, but did not provide the public with pertinent information.

In the event of any incident at the Airport involving aircraft, the County would follow its emergency and Airport Certification Manual (ACM) procedures, which is required by FAA. As explained in the PEIR, pursuant to FAA 14 CFR Part 139, the County is required to maintain a current ACM, including an Airport Emergency Plan, which is designed to meet FAA rules and regulations. The ACM provides clear direction and identifies responsibilities in the day-to-day operation of the Airport, and it outlines operating procedures to address routine matters, unusual circumstances, or emergencies that may arise. The ACM is required by FAA as a component of the Airports Class I Part 139 Certification status, which allows for commercial airline service. Individual sections of the ACM are updated on an as-needed basis with FAA direction and approval. The most recent revisions were approved by FAA in August 2017 as reflected in the applicable sections. Specifically, Chapter 11 of the ACM outlines the requirements for handling hazardous materials at the Airport, and the level of training required. The ACM is essential to ensure safe and efficient operation of the Airport. Chapter 13 of ACM encompasses the Airport Emergency Plan as outlined in FAA AC 150/5200-31, which has been approved by FAA and is the governing document for the airport's emergency response.

- 175-5** Ongoing maintenance, monitoring, and reporting of the inactive landfill is not within the scope the Master Plan Update improvements, and as such, this comment does not specifically identify an environmental issue with the PEIR analysis.

The Airport is located within the Encinas Hydrologic Unit. The RWQCB's Basin Plan designates that the groundwater in this basin is not of adequate quality to be considered for beneficial use. This determination was made based upon the naturally-occurring high levels of chloride and total dissolved solids within the entire basin, not just underneath the inactive landfill. Water Quality Objectives are established to protect beneficial uses. Therefore, although constituent concentrations may exceed the Water Quality Protection Standards (WQPS), they do not impact existing or potential beneficial uses of groundwater in the Encinas Basin as defined by the RWQCB. To provide clarification of RWQCB Order 96-13 (Waste Discharge Requirements for Post-Closure Maintenance), the County is required to conduct semi-annual monitoring inspections of the landfill areas. The purpose of these surveys is to ensure the County is properly maintaining the inactive landfill and to ensure its three units are not impacting groundwater or surface water quality. Therefore, while Order 96-13 requires the County to not adversely affect beneficial uses, the RWQCB's Basin Plan designates that the groundwater in this basin is not of adequate quality to be considered for beneficial use, nor does Order 96-13 require the County to remediate naturally-occurring constituents.

The County continues to coordinate with RWQCB to ensure groundwater monitoring activities for the closed landfill have been or are currently being addressed. The RWQCB also provided a comment letter on the Draft PEIR, which has been cataloged as Comment Letter S4 and which acknowledges the inactive landfill is regulated by Order No. 96-13. The items raised by this comment were included in the PEIR and further addressed in this response. No changes to the PEIR have been made in response to this comment.

- 175-6** Please refer to **Master Response 10 (Program-level vs. Project-level Review)**.

- I75-7** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**. The commenter also requests additional information that is not related to the PEIR. No further response is necessary.
- I75-8** The County acknowledges this comment. Although the commenter disagrees with the defined mitigation, the comment does not identify a specific issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-9** Please refer to **Response to Comments L3-40 and L3-43**.
- I75-10** The County acknowledges this comment; however, since it relates to the Airport's classification, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I75-11** The County disagrees that environmental documents were not considered in the development of the PEIR. Various federal, state, and local regulations were addressed throughout the PEIR. Nonetheless, this comment does not raise specific issues regarding the substantive environmental analysis conducted within the PEIR. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I75-12** The comment states the commenter's opinion regarding compliance with local land use and federal aviation laws. The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088.
- I75-13** The comment includes introductory and summary remarks regarding the commenter's position of the project alternatives. The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-14** The comment includes introductory and summary remarks regarding the commenter's position of the project alternatives. The commenter's opinion on the County's evaluation is noted; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-15** The comment includes various remarks questioning the project objective of safety. The commenter's opinion on the County's evaluation is noted; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-16** The comment includes various remarks questioning the project objective of financial feasibility. The commenter's opinion on the County's evaluation is noted; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-17** The comment includes various remarks questioning the project objective of avoiding impacts to Airport businesses. The commenter's opinion on the County's evaluation is noted; however, it does not raise an issue concerning the analysis or adequacy of the

PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-18 The comment includes various remarks questioning the project objective of accommodating aviation demand. The commenter's opinion on the County's evaluation is noted; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-19 Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.

I75-20 The comment includes various remarks questioning the project objective of minimizing environmental impacts. The commenter's opinion on the County's evaluation is noted; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-21 The comment includes various remarks questioning the project objective of minimizing offsite impacts to the surrounding community. The commenter's opinion on the County's evaluation is noted; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-22 The comment includes various remarks questioning the project objective of achieving FAA design criteria to be eligible for FAA grant funding. The commenter's opinion on the County's evaluation is noted; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-23 The comment includes remarks directed to the Board of Supervisors for consideration of the Proposed Project. The County acknowledges the comments; however, they do not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

I75-24 These are conclusion comments. They do not raise specific issues regarding the content of the PEIR, but will be included as part of the administrative record and made available to the County Board of Supervisors prior to a final decision on the Proposed Project.

I75-25 The County acknowledges these introductory comments; however, they do not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

I75-26 The comment includes summary remarks related to the Airport's background and historical coordination with the City of Carlsbad. However, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-27 Please refer to each section of the PEIR for a discussion of which regulations apply to the respective environmental resources. As noted throughout the PEIR, the County

Guidelines for Determining Significance apply to the Proposed Project, and where applicable, additional Federal, State, and/or City of Carlsbad regulations were applied.

The comment states that the County did not consider City of Carlsbad guidance or regulations. To the contrary, the PEIR includes numerous citations to City documents that were considered in the environmental analysis, and would be considered during implementation of future elements of the Master Plan Update.

Also, please refer to the Final PEIR which clarifies that future private development at the Airport may be subject to discretionary review by the City of Carlsbad; however, the County maintains land use authority over public improvements such as the Airport. Because the Airport is within the City of Carlsbad, the County's General Plan does not have a zoning or land use designation for the Airport. Nonetheless, the County still retains land use authority over public improvements. As a County-owned facility, the County's General Plan goals and policies would apply to the Airport and Master Plan Update (such as they would apply to all County-owned facilities including all eight County airports.)

Furthermore, as described in the PEIR Section 3.1.7.1.2, the Airport is located on County property within the municipal limits of the City of Carlsbad and is zoned Industrial (M) pursuant to the Carlsbad Municipal Code (CMC) Title 21 "Zoning Ordinance" (Section 21.34) and consists of government (airport) facility land uses. The County has immunities from the City's land use restrictions (see, for example, Government Code Section 53090, et seq.); however, the County will continue to coordinate with the City in an effort to ensure City requirements are taken into consideration.

I75-28 Please refer to **Response to Comment I75-27** for information regarding the relationship between the County General Plan, the Airport, and Master Plan Update. Also, the PEIR Section 3.1.7.1.2 of the PEIR provides a detailed list of the relevant policies, ordinances, and adopted plans applicable to the Proposed Project, including a list of applicable goals and policies included in the San Diego County General Plan that are applicable to the Proposed Project. As the Master Plan Update is a planning document for a County-owned facility, the County's General Plan goals and policies apply; however, the Master Plan Update is a facility plan and is not part of the County's General Plan. Proper notice and outreach was conducted during the public review of the Draft PEIR, and notice will be given prior to the County Board of Supervisors hearing in accordance with applicable provisions of the Brown Act (Government Code Sections 54950-54963), County Board Policies, and County Rules of Procedure.

The remaining remarks under this comment ask questions that do not provide evidence that the project would have a significant effect on the environment. Therefore, no changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project, and no further response is required.

I75-29 Please refer to **Response to Comments I75-27 and I75-28**. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board

of Supervisors prior to a final decision on the Proposed Project, and no further response is required.

I75-30 The commenter summarizes the intent and expectations of State legislation regarding an airport sponsor's coordination with the ALUC. The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-31 The comment includes introductory remarks pertaining to state and local laws related to County-initiated development. The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-32 Please refer to **Response to Comments I75-27 and I75-28**. The comment does not provide evidence that the project would have a significant effect on the environment. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project, and no further response is required.

I75-33 Please refer to **Response to Comments I75-27 and I75-28**. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project, and no further response is required.

I75-34 Please refer to **Response to Comment I75-27**. The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-35 Please refer to **Response to Comment I75-27**. The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088.

The commenter also requests additional information that is not related to the PEIR. No further response is necessary.

I75-36 The comment incorrectly states that the PEIR mitigation relies on applying the policies of the County or City General Plans. While General Plan policies are identified in the PEIR to demonstrate consistency, the PEIR includes project-specific mitigation based on the provided analysis. No changes to the PEIR have been made in response to this comment.

I75-37 Specific mitigation measures are included in the PEIR. Regarding enforceable mechanisms, it is the County's responsibility as Lead Agency to comply with CEQA and any other regulatory requirements to fully implement mitigation for project-specific impacts. Reporting requirements would be dictated by the permitting agencies, as needed. Also, as part of the Final PEIR, a Mitigation Monitoring and Reporting Program

would be implemented documenting the County's compliance with all mitigation. No changes to the PEIR have been made in response to this comment.

The commenter also requests additional information that is not related to the PEIR. No further response is necessary.

I75-38 Please refer to **Response to Comments I75-27 and I75-28**. The comment does not provide evidence that the project would have a significant effect on the environment. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

I75-39 Please refer to **Master Response 5 (Airport Expansion/Public Vote)**. Also see **Response to Comments I75-27 and I75-28**. Additionally, the intent of County General Plan Goal LU-4 is to promote coordination between jurisdictions on “plans and activities of other agencies and tribal governments...” While the community group Citizens for a Friendly Airport (C4FA) may represent the interests of members in the community, it does not qualify as an agency or government applicable to Goal LU-4. Accordingly, Goal LU-4 is not applicable to the scenario described by the commenter. Nonetheless, the County has conducted multiple outreach events during public review of the Draft PEIR and Master Plan Update, including two public workshops, one open house, and various stakeholder and outreach meetings.

The comment also references a separate topic (i.e., 2004 parking) that is not associated with the proposed Master Plan Update. No changes to the PEIR have been made in response to this comment.

I75-40 This comment includes statements regarding the Airport's historical and current operations and maintenance of the onsite inactive landfill. Specifically, this comment references an event in January 2008, in which subsurface oxidative combustion occurred within the inactive landfill. It should be clarified the commenter's reference to an “underground fire” is misrepresented as the event consisted of a slow smoldering of inactive landfill materials due to the introduction of oxygen, with no open flame. The cause of the event was determined to be a failed corrugated steel storm drain pipe due to natural corrosion and settlement of the landfill material. This resulted in the inactive landfill material becoming exposed to air, resulting in oxidation. These types of subsurface rising temperatures at landfills are typical. Rapid oxidation of organic matter mixed and compacted with water, bacteria, and gases cause a biological process to naturally generate a smolder.

During a routine inspection in January 2008 following a rain event, County staff observed a depression approximately 50 feet in diameter and 3 feet deep in the northwestern portion of the inactive landfill Unit 3. Staff suspected that a subsurface oxidation event could be the cause of the depression, and SCS Engineers was directed to install temperature sensors near the center of the depression. Five sensors were installed at varying depths below ground surface. The monitors indicated that lower elevations were experiencing higher temperatures. To verify whether subsurface combustion was occurring, SCS Engineers collected carbon monoxide (CO) measurements of the landfill gas in February 2008. The reported CO concentration was in excess of 1,000 parts per million (ppm), which indicates that active combustion is likely occurring. To mitigate the subsurface combustion, actions were taken to remove the oxygen in the immediate

vicinity of the area underground. Specifically, the depression was filled with approximately 250 cubic yards of compacted soil. To prevent air intrusion through the existing landfill gas extraction wells, all wellheads within Unit 3 were replaced. The RWQCB, LEA, and APCD were all advised of the event and results. In May and June 2008, additional temperature probes were installed to better define the extent of the combustion area. Upon studying the data, a plan was developed in August 2008 to further mitigate the combustion. Injection of liquid carbon dioxide was performed after approval from the LEA and APCD in September 2008 to offset the subsurface oxidation. Lastly, to avoid further oxidation from occurring, the corrugated steel storm drain pipe was filled with concrete to prevent further air and water infiltration into the landfill. During the course of this event, all appropriate agencies were kept advised of the process and any additional actions (notifications, permits, variances, etc.) were performed to the satisfaction of all agencies.

Regarding environmental effects, potential impacts involving Hazards and Hazardous Materials are discussed in Section 2.3 of the PEIR. Specifically as discussed in Section 2.3.6, mitigation measures have been identified that would reduce the potential impacts from implementation of the Proposed Project to less than significant. No changes to the PEIR have been made in response to this comment. Regarding the draft report by SCS Engineers dated October 2013; this topic was previously raised by the commenter. Please see **Response to Comment I75-4**. As this comment does not provide evidence of an error in the CEQA analysis or evidence of a new significant effect, no changes to the PEIR have been made in response to this comment.

I75-41 Please refer to **Response to Comment I75-4** regarding the October 2013 SCS Engineers report. Regarding RWQCB Order 96-13, please refer to **Response to Comment I75-5**.

I75-42 Please refer to **Response to Comments I75-27 and I75-28**. The comment does not provide evidence that the project would have a significant effect on the environment. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

I75-43 Please refer to **Response to Comments I75-27 and I75-28**. The comment does not provide evidence that the project would have a significant effect on the environment. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

I75-44 The commenter requests additional information that is not related to the PEIR. No further response is necessary.

I75-45 As discussed in Section 2.1.2.1 of the PEIR, the Master Plan Update does not propose irrigating or landscaping the eastern slope along the inactive landfill. This section of the PEIR explains several factors that prevent implementation of irrigation and landscaping of slopes that contain inactive landfill materials. Nonetheless, the County is amenable in coordinating with the City of Carlsbad to identify solutions for improving the landscape conditions of the existing slopes surrounding the Airport.

As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

I75-46 Please refer to **Response to Comment I75-45**.

I75-47 The comment asserts that during construction of the runway extension, there would be no methane gas collection system installed, thus damaging air and water quality as methane is released. As noted in the PEIR, the exact scope, scale, and timing for construction of certain elements will be determined once funding is identified for project design engineering and construction. Areas of impact are estimated for project elements (such as the runway extension), as they have not been developed sufficiently to quantify exact impacts in most cases, and therefore, are analyzed at a programmatic level. Once funding is identified for the design engineering and construction of individual Master Plan Update projects, the exact impact area will be further analyzed. Additional analysis under CEQA will be required for projects at the time that they are designed and proposed. Regarding RWQCB Order 96-13, refer to **Response to Comment I75-5**.

I75-48 Pursuant to FAA 14 CFR Part 139, the County is required to maintain a current Airport Certification Manual (ACM), including an Airport Emergency Plan, which is designed to meet FAA rules and regulations. The ACM provides clear direction and identifies responsibilities in the day-to-day operation of the Airport, and it outlines operating procedures to address routine matters, unusual circumstances, or emergencies that may arise. The ACM is required by FAA as a component of the Airports Class I Part 139 Certification status, which allows for commercial airline service. Individual sections of the ACM are updated on an as-needed basis with FAA approval. The most recent revisions were approved by FAA in August 2017 as reflected in the applicable sections. Specifically, Chapter 11 of the ACM outlines the requirements for handling hazardous materials at the Airport, and the level of training required. The ACM is essential to ensure safe and efficient operation of the Airport. Chapter 13 of ACM encompasses the Airport Emergency Plan as outlined in FAA AC 150/5200-31, which has been approved by FAA. At the time of this writing, the Airport Emergency Plan is being revised; however, for security reasons it is not available for release to the public.

All business entities that handle, store, or dispose of hazardous materials in prescribed quantities must prepare a Hazardous Materials Business Plan (HMBP). The HMBP is enacted as soon as there is a fire or explosion, or an accidental hazardous material is released into the environment. HMBPs must be prepared as outlined by Chapter 6.95 of the California Health and Safety Code (H&SC) and/or the County Code Section 68.1113 and at a minimum, should contain an inventory of hazardous materials, an emergency response plan, and an employee training program. HMBPs are submitted to the County Department of Environmental Health's (DEH) Hazardous Materials Division and revised or amended every three years. However, HMBPs can be amended sooner if there is a 100 percent increase in any hazardous material listed on the inventory, a threshold is exceeded for a previously undisclosed hazardous materials, a change in the storage, location or use of a hazardous material, or a change in the business name, address, or ownership. The Airport handles, stores, and disposes of hazardous materials. As such, it is required to maintain and update a HMBP.

I75-49 Please refer to **Response to Comments I75-47 and I75-48**.

I75-50 The County acknowledges these introductory comments; however, they do not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

I75-51 Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.

I75-52 Please refer to **Response to Comment I75-51**. The commenter requests additional information that is not related to the PEIR. No further response is necessary.

I75-53 The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-54 Mitigation measures M-TR-1 and M-TR-2 reduce traffic impacts to a less than significant level. Please refer to the PEIR, Section 7.1.5 (Transportation & Traffic). No changes have been made to the PEIR in response to this comment.

I75-55 Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.

I75-56 This comment includes introductory remarks that the Master Plan Update violates City of Carlsbad General Plan policies related to air quality. The commenter elaborates on this point in Comments I75-57 and I75-58. As such, please refer to **Response to Comments I75-57 and I75-58** below.

I75-57 The comment asserts the Master Plan Update does not discuss when leaded aviation fuel would be banned. The County is unaware when FAA intends to eliminate leaded-fuel for aircraft (i.e., Avgas). The County recommends contacting FAA, or reviewing FAA's most recently published articles at www.faa.gov/about/initiatives/avgas. Regarding lead emissions, please refer to **Response to Comment I48-3**. A discussion of lead monitoring at the Airport is also included in the PEIR Chapter 3.1.2.1.

The comment asserts that any emission of criteria pollutants would result in a significant impact because the San Diego Air Basin is currently in non-attainment for ozone. This is incorrect. According to the County of San Diego Guidelines for Determining Significance for Air Quality (March 19, 2007), the threshold by which a project is analyzed includes whether a cumulatively considerable net increase of any criteria pollutant would occur for which the project region is non-attainment under an applicable Federal or State ambient air quality standard. As demonstrated in the PEIR, the Master Plan Update would not result in a significant air quality impact. No changes to the PEIR have been made in response to this comment.

I75-58 The comment requests an explanation how the Master Plan Update would comply with various policies of the City of Carlsbad General Plan Chapter 4 related to air quality. Specifically, these policies include participating in transportation demand programs (4-P.52), cooperating with State and Federal agencies to improve air quality (4-P.55), and ensuring construction projects minimize short-term air quality impacts (4-P.56). Whenever possible, consistent with the County's obligations to the federal government as a grant recipient, the County endeavors to voluntarily seek approvals from the City and require its tenants and contractors to seek approvals from the City as a means of coordinating airport development with City land use requirements. The County,

however, has immunities from City building and zoning ordinances and cannot waive those immunities without risking a violation of its federal sponsor assurances. (See, Govt. Code § 53090, et seq. & FAA Sponsor Assurances, Assurance No. 5.) While these immunities apply to projects by the County and other public agencies, they can also apply to projects by airports lessees and contractors. (See, *Bame v. City of Del Mar* (2001) 86 Cal. App. 4th 1350.) Furthermore, as this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

I75-59 Please refer to **Master Response 10 (Program-level vs. Project-level Review)**. Regarding RWQCB Order 96-13, please refer to **Response to Comment I75-5**.

I75-60 The Palomar Airport and the future projects under the Master Plan Update are under the jurisdiction of the County and as such, are not required to comply with the City of Carlsbad's General Plan policies. In addition, as discussed in various sections of the PEIR, the project would be required to comply with all applicable water quality regulations, policies, and programs, including all appropriate stakeholders and agencies. Furthermore, the Proposed Project would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollution Discharge Elimination System Construction Permit. Therefore, while the proposed project is not required to conform to the City of Carlsbad's General Plan, it would be consistent with water quality policies 4-P.57 and 4-P.58. No revisions to the PEIR have been made in response to this comment.

I75-61 As discussed in the PEIR Section 2.4.1, jurisdiction and regulatory enforcement over aircraft in flight is under the domain of the FAA. Accordingly, neither the County nor the City of Carlsbad has the authority to implement mandatory noise abatement.

Regarding the commenter's concern of aircraft noise, County staff researched the commenter's location and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the commenter's location was estimated to be 40.40dB, and its future condition without the Proposed Project is estimated to be 42.21dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 42.42dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

I75-62 Please refer to **Master Response 3 (Voluntary Noise Abatement Procedures)**.

I75-63 The County acknowledges these introductory comments; however, they do not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

I75-64 The County acknowledges these introductory comments; however, they do not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines

Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

- I75-65** The County acknowledges these introductory comments; however, they do not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I75-66** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-67** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-68** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-69** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I75-70** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-71** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.
- I75-72** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.
- I75-73** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Regarding RWQCB Order 96-13, please refer to **Response to Comment I75-5**. Therefore, no further response is required.
- I75-74** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. Regarding the October 2013 SCS Engineers report, please refer to **Response to Comment I75-4**.
- I75-75** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-76** Regarding RWQCB Order 96-13, please refer to **Response to Comment I75-5**. Ongoing maintenance, monitoring, and reporting of the inactive landfill is not within the scope the Master Plan Update improvements, and as such, this comment does not specifically identify an environmental issue with the PEIR analysis.

- I75-77** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-78** Please refer to **Response to Comment I75-4**.
- I75-79** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.
- I75-80** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-81** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.
- I75-82** This comment is noted, however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-83** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.
- I75-84** Please refer to **Master Response 10 (Program-level vs Project-level Review)**.
- I75-85** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-86** The County acknowledges this introductory comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-87** Please refer to **Master Response 6 (Existing Airport Activity)**.
- I75-88** Please refer to **Master Response 6 (Existing Airport Activity)** and **Master Response 10 (Program-level vs Project-level Review)**.
- I75-89** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-90** Please refer to the Final PEIR which clarifies that future private development at the Airport may be subject to discretionary review by the City of Carlsbad; however, the County maintains land use authority over public improvements such as the Airport. Because the Airport is within the City of Carlsbad, the County's General Plan does not have a zoning or land use designation for the Airport. Nonetheless, the County still retains land use authority over public improvements. As a County-owned facility, the County's General Plan goals and policies would apply to the Airport and Master Plan Update (such as they would apply to all County-owned facilities including all eight County airports.)
- I75-91** For all responses to the City of Carlsbad's letter regarding cumulative projects, please refer to **Response to Comment L3**.
- I75-92** As stated in Section 1.2.1 of the PEIR, the Proposed Project includes Taxiway A extension, runway extension, and EMAS in the eastern portion of the Airport that would

occur on soils of an inactive landfill. These engineered changes are considered in the analysis and would not affect the integrity of the landfill cover.

These landfill materials are considered subject to settlement. Due to the presence of potentially collapsible soils, there is a potential risk from differential settlement. The Proposed Project is required by the County to incorporate structural design recommendations from a detailed subsurface geotechnical evaluation report that would assess the potential for collapsible soils.

Additionally, the Airport would prepare a SWPPP and implement pre- and post-construction BMPs, as required by the San Diego County Regional Water Quality Control Board, which would minimize the potential for unstable soils. Compliance with state and local regulations, including the CBC, would reduce potential effects during grading and excavation, and implementation of the Proposed Project.

Once projects are designed, any project that would disturb landfill areas would need to prepare a remediation plan outlining construction methods and contaminant avoidance. The plans will be reviewed and enforced by regulatory agencies.

Please refer to **Master Response 5 (Airport Expansions/Public Vote)**.

No changes were made to the PEIR in response to this comment.

I75-93 Regarding RWQCB Order 96-13, please refer to **Response to Comment I75-5**. Ongoing maintenance, monitoring, and reporting of the inactive landfill is not within the scope the Master Plan Update improvements, and as such, this comment does not specifically identify an environmental issue with the PEIR analysis.

I75-94 Please refer to **Response to Comment I75-4**.

I75-95 Of all of the land use compatibility zones reflected in an airports ALUCP, only Zone 1, associated with the RPZ is fixed in terms of size and intensity, those potential RPZ impacts have been reviewed and an option to mitigate them has been presented. Other Zones, 2 through 6, are not fixed in terms of size or intensity and will only be fully determined during the SDCRAA ALUCP update process which can only take place after the County has determined which alternative it is going to pursue. It will be up to SDCRAA to determine the size and intensity of future zones around the airport.

I75-96 The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-97 Please refer to **Master Response 6 (Existing Airport Activity)** and **Master Response 9 (Increase in Airport Operations)**.

I75-98 The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-99 The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

- I75-100** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-101** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-102** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-103** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-104** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-105** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-106** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-107** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-108** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-109** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-110** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-111** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-112** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

- I75-113** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-114** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-115** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-116** The CBC regulates the excavation of foundations by requiring preparation of a preliminary soil report, engineering geologic report, geotechnical report, and supplemental ground-response report. Conducting a geotechnical report specifically for the landfill areas prior to construction, and compliance with state and local regulations, including the CBC, would reduce the potential effects related to liquefaction during grading and excavation. Additionally, compliance with the CBC will ensure that implementation of the Proposed Project will maximize structural stability.
- The comment requests specific information regarding specific project elements in relation to the runway extension. Please refer to **Master Response 10 (Program-level vs. Project-level Review)**. No changes have been made to the PEIR in response to this comment.
- I75-117** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-118** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-119** The comment includes conclusive remarks and citation to the commenter's attachment (i.e., exhibit). Please refer to **Response to Comment I75-4**.
- I75-120** Sections 15105 and 21091 of the CEQA Guidelines requires a minimum of 45 days for the public review period for a draft EIR. The Lead Agency has the discretion to increase the public review period but is not required to extend past the mandatory 45-day period. The County extended the original public comment period, which ended on March 5, 2018, by two weeks, with an end date of March 19, 2018. Therefore, the County complied with the requirements of the CEQA Guidelines.
- I75-121** Please refer to **Master Response 10 (Program-level vs. Project-level Review)**.
- I75-122** As described in Section 1.2.1 of the PEIR, the retaining wall is needed to support the extension of Taxiway A and provide support for the fill required to install the EMAS. It would also allow for the relocation of the vehicle service road while remaining out of the RSA. The commenter also requests additional information that is not related to the adequacy or analysis of the PEIR. No further response is necessary.

- I75-123** Please see **Master Response 5 (Airport Expansion/Public Vote)** for discussion of the airport boundaries. Please also see **Master Response 10 (Program-level vs. Project-level Review)** for a discussion of Program-level vs. Project-level review.
- I75-124** Please see **Master Response 10 (Program-level vs. Project-level Review)** for discussion of Program-level vs. Project-level review.
- I75-125** The project is not subject to CUP 172. Please refer to **Master Response 5 (Airport Expansion/Public Vote)**. The commenter also requests additional information that is not related to the adequacy or analysis of the PEIR. No further response is necessary.
- I75-126** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-127** Please refer to **Master Response 9 (Increase in Aircraft Operations)**.
- I75-128** Please refer to **Master Response 9 (Increase in Aircraft Operations)**. The commenter also requests additional information that is not related to the adequacy or analysis of the PEIR. No further response is necessary.
- I75-129** As stated in Section 2.1.6 of the PEIR, the development of the Proposed Project would comply with all federal, state, and local regulations and policies.
- Landfill materials are subject to settlement. Due to the presence of potentially collapsible soils, there is a potential risk from differential settlement. San Diego County requires structural design recommendations from a detailed subsurface geotechnical evaluation report that would assess the potential for collapsible soils.
- Once projects are designed, any project that would disturb landfill areas would need to prepare a remediation plan outlining construction methods and contaminant avoidance. The plans will be reviewed and enforced by regulatory agencies.
- I75-130** Regarding RWQCB Order 96-13, please refer to **Response to Comment I75-5**.
- I75-131** Please see **Master Response 10 (Program-level vs. Project-level Review)** for discussion of Program-level vs. Project-level review. Furthermore, at this time, it is not known how the ALUCP, which is published by the San Diego County Regional Airport Authority (SDCRAA), would be updated to reflect the Master Plan Update. Upon a decision of a selected alternative by the County Board of Supervisors, County staff will initiate revisions to the Airport Layout Plan in consultation with the SDCRAA.
- I75-132** The comment requests specific information regarding specific project elements in relation to the runway extension. Please refer to **Master Response 10 (Program-level vs. Project-level Review)**. No changes have been made to the PEIR in response to this comment.
- I75-133** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-134 The comment requests specific information regarding specific project elements in relation to the runway extension. Please refer to **Master Response 10 (Program-level vs. Project-level Review)**. No changes have been made to the PEIR in response to this comment.

I75-135 The comment requests specific information regarding specific project elements in relation to the runway extension. Please refer to **Master Response 10 (Program-level vs. Project-level Review)**.

Furthermore, these landfill materials are considered subject to settlement. Due to the presence of potentially collapsible soils, there is a potential risk from differential settlement. The Proposed Project is required by San Diego County to incorporate structural design recommendations from a detailed subsurface geotechnical evaluation report that would assess the potential for collapsible soils.

Additionally, the Airport would prepare a SWPPP and implement pre- and post-construction BMPs, as required by the San Diego County Regional Water Quality Control Board, which would minimize the potential for unstable soils. Compliance with state and local regulations, including the CBC, would reduce potential effects during grading and excavation, and implementation of the Proposed Project.

Once projects are designed, any project that would disturb landfill areas would need to prepare a remediation plan outlining construction methods and contaminant avoidance. The plans will be reviewed and enforced by regulatory agencies.

I75-136 Please refer to **Master Response 1 (Recirculation of the EIR)**.

I75-137 Please refer to **Master Response 6 (Existing Airport Activity)**, which explains that the PEIR analyzes potential environmental impacts associated with the Master Plan Update and is not required to analyze existing Airport operations not associated with the Proposed Project. Regarding the October 2013 SCS Engineers report, this topic was previously raised by the commenter. Please refer to **Response to Comment I75-4**. No changes to the PEIR were made in response to this comment.

I75-138 As stated in Section 1.1.3 of the PEIR, installation of an EMAS is a voluntary safety improvement. The purpose of an EMAS is to safely stop an aircraft overrun to prevent human injury and aircraft damage. Although an EMAS is not a substitute for additional runway length, it does enhance safety by minimizing the impact of an aircraft overrun. The commenter also requests additional information that is not related to the adequacy or analysis of the PEIR. No further response is necessary.

I75-139 The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. The commenter also requests additional information that is not related to the adequacy or analysis of the PEIR. No further response is necessary.

I75-140 Regarding the Proposed Project and potential risk upsets, upon notification or discovery of a potential risk to public health or the environment, an evaluation will be made of the potential risk and the appropriate remedial action will be initiated.

Pursuant to FAA 14 CFR Part 139, the County is required to maintain a current Airport Certification Manual (ACM), including an Airport Emergency Plan, which is designed to meet FAA rules and regulations. The ACM provides clear direction and

identifies responsibilities in the day-to-day operation of the Airport, and it outlines operating procedures to address routine matters, unusual circumstances, or emergencies that may arise. The ACM is required by FAA as a component of the Airports Class I Part 139 Certification status, which allows for commercial airline service. Individual sections of the ACM are updated on an as-needed basis with FAA approval. The most recent revisions were approved by FAA in August 2017 as reflected in the applicable sections. Specifically, Chapter 11 of the ACM outlines the requirements for handling hazardous materials at the Airport, and the level of training required. The ACM is essential to ensure safe and efficient operation of the Airport. Chapter 13 of ACM encompasses the Airport Emergency Plan as outlined in FAA AC 150/5200-31, which has been approved by FAA. At the time of this writing, the Airport Emergency Plan is being revised; however, for security reasons it is not available for release to the public.

All business entities that handle, store, or dispose of hazardous materials in prescribed quantities must prepare a Hazardous Materials Business Plan (HMBP). The HMBP is enacted as soon as there is a fire or explosion, or an accidental hazardous material is released into the environment. HMBPs must be prepared as outlined by Chapter 6.95 of the California Health and Safety Code (H&SC) and/or the County Code Section 68.1113 and at a minimum, should contain an inventory of hazardous materials, an emergency response plan, and an employee training program. HMBPs are submitted to the County Department of Environmental Health's (DEH) Hazardous Materials Division and revised or amended every three years. However, HMBPs can be amended sooner if there is a 100 percent increase in any hazardous material listed on the inventory, a threshold is exceeded for previously undisclosed hazardous materials, a change in the storage, location or use of a hazardous material, or a change in the business name, address, or ownership. The Airport handles, stores, and disposes of hazardous materials. As such, it is required to maintain and update a HMBP.

Businesses that maintain a Risk Management Plan (RMP) within San Diego County are primarily those that handle chlorine gas (e.g., wastewater treatment plants and refrigeration facilities). The Airport does not handle chlorine gas and is not required to have a RMP.

- I75-141** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. The commenter also requests additional information that is not related to the adequacy or analysis of the PEIR. No further response is necessary.
- I75-142** The comment references an “underground fire” that occurred in the inactive landfill Unit 3. Please refer to **Response to Comment I75-40** for a discussion of this event, which is commonly referred to as a subsurface oxidation event. Any incident would require specific troubleshooting, data collection, and review by the landfill staff and consultant, notification and coordination with applicable agencies, and reporting and incident closure. This comment also requests the PEIR to cite specific measures that could be applied immediately during “risk upsets” (i.e., fire events). This comment pertains to existing conditions and ongoing operation of the Airport. This comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation. Also, please see **Master Response 6 (Existing Airport**

Activity). Nonetheless, upon notification or discovery of a potential risk to public health or the environment, an evaluation will be made of the potential risk and the appropriate remedial action will be initiated. Furthermore, pursuant to FAA 14 CFR Part 139 and as outlined in the PEIR Section 2.3.1, the County is required to maintain a current Airport Certification Manual (ACM), including an Airport Emergency Plan, which is designed to meet FAA rules and regulations. The ACM provides clear direction and identifies responsibilities in the day-to-day operation of the Airport, and it outlines operating procedures to address routine matters, unusual circumstances, or emergencies that may arise. No changes to the PEIR have been made in response to this comment.

I75-143 The comment references an “underground fire” that occurred in the inactive landfill Unit 3. Please refer to **Response to Comment I75-40** for a discussion of this event, which the County refers to as subsurface oxidation.

This comment also expresses concern that when the runway is extended, construction activities may impact the existing gas collection control system. As described in the PEIR, the exact scope, scale, and timing for construction of the Master Plan Update elements will be determined once funding is identified for project design engineering and construction. Therefore, the associated environmental impact for each element, and the Master Plan Update as a whole, is analyzed at a programmatic level for the purpose of environmental analysis. Additional analysis under CEQA will be required for projects at the time that they are designed and proposed. Furthermore, the County Department of Public Works, Landfill Management Division, is responsible for managing the Airport’s inactive landfill and maintains a record of the existing gas collection control system. As project elements of the Master Plan Update are designed, it would identified at that time whether portions of the gas collection control system would need to be temporarily or permanently relocated.

The comment also requests information related to underground infrastructure, airport permitting system that oversees underground storage tanks, and any inspection system to assure that damages to airport infrastructure are quickly discovered. As this comment includes a request for information, it does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation. Nonetheless, it should be clarified that all Airport tenants have documented leases with the County. Under these leases, the tenants are required to abide by all federal, state, and local laws. Installation of underground storage tanks requires permitting from the County Department of Environmental Health and must be performed under its supervision. Any modification to underground storage tanks or related system without County review would be illegal and in violation of a tenant’s lease.

As this comment does not provide evidence of an error in the CEQA analysis nor evidence of a new significant effect, no changes to the PEIR have been made in response to this comment.

I75-144 The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. The commenter also requests additional information that is not related to the adequacy or analysis of the PEIR. No further response is necessary.

- I75-145** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. The commenter also requests additional information that is not related to the adequacy or analysis of the PEIR. No further response is necessary.
- I75-146** The commenter states that the Master Plan Update projects will allow larger jets to operate at the Airport, creating significant noise impacts. As discussed in Section 2.4.2.2, the noise analysis completed for the PEIR indicates that the noise impacts associated with future aircraft operations and operation of the Airport would be less than significant. The commenter also requests additional information that is not related to the adequacy or analysis of the PEIR. No further response is necessary.
- I75-147** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-148** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-149** Please refer to **Master Response 10 (Program-level vs. Project-level Review)**.
- I75-150** The Proposed Project would include relocating the existing ARFF facilities and reconstructing them in accordance with “Index B”. The relocated facilities would be sited south of the existing ATCT and west of an existing access road. The Proposed Project does not include expansion of the Airport, and all planned improvements would occur within existing County-owned parcels. As a result, the Proposed Project would not adversely impact response times by the City Fire Department, nor require the construction of additional fire services.
- I75-151** The objectives of the project are to maximize safety and efficiency of the airport and accommodate forecasted demand in the next 20-year planning period.
- I75-152** Please refer to **Master Response 10 (Program-level vs. Project-level Analysis)**. The commenter also requests additional information that is not related to the adequacy or analysis of the PEIR. No further response is necessary.
- I75-153** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. The commenter also requests additional information that is not related to the adequacy or analysis of the PEIR. No further response is necessary.
- I75-154** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. The commenter also requests additional information that is not related to the adequacy or analysis of the PEIR. No further response is necessary.
- I75-155** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-156** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines

Section 15088. The commenter also requests additional information that is not related to the adequacy or analysis of the PEIR. No further response is necessary.

- I75-157** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-158** This comment requests the County to calculate the potential cost of removing inactive landfill material in the event of an aircraft collision, and to identify other consequences of such a collision. First, please refer to **Response to Comment I75-4** for a discussion of the draft report by SCS Engineers dated October 2013. Second, the PEIR previously disclosed that a potential environmental impact may occur associated with the grading or excavation of inactive landfill materials, and it would be inappropriate to speculate the impact of a theoretical condition described by the commenter. Third, the Airport land currently includes the inactive landfill, which would continue to exist under the Proposed Project. This comment includes requests for information, and it does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation. Therefore, no changes to the PEIR have been made in response to this comment.
- I75-159** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-160** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-161** The comment requests specific information regarding specific project elements. Please refer to **Master Response 10 (Program-level vs. Project-level Review)**. No changes have been made to the PEIR in response to this comment.
- I75-162** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-163** Refer to **Master Response 5 (Airport Expansion/Public Vote)**.
- I75-164** As stated in the PEIR, the Master Plan Update is a long-term planning document, and the exact scope, scale, and timing for implementation of each proposed element are not yet defined because project-specific information has not been fully developed to quantify exact impacts. Additional analysis under CEQA will be required for projects at the time that they are designed and proposed. The Master Plan Update is not required to propose mitigation measures for effects found not to be significant.
- I75-165** As discussed in Section 2.1.2.1 of the PEIR, the Master Plan Update does not propose irrigating or landscaping the eastern slope along the inactive landfill. This section of the PEIR explains several factors that prevent implementation of irrigation and landscaping of slopes that contain inactive landfill materials. Nonetheless, the County is amenable in coordinating with the City of Carlsbad to identify solutions for improving the landscape conditions of the existing slopes surrounding the Airport.

I75-166 Please refer to **Response to Comments I75-27 and I75-28**. The comment does not provide evidence that the project would have a significant effect on the environment. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project, and no further response is required.

I75-167 The Draft PEIR Section 3.1.7.1.2 (page 3-83; subheading *Airport Land Use Compatibility Plan*) states the following:

Cities and Counties with land use jurisdiction for areas around airports are required to ensure their general and specific plans are consistent with the ALUCP. The authority of cities and counties to adopt land use plans that are inconsistent with an ALUCP is constrained by State law. (Government Code Section 65302.3 & Public Utilities Code Section 21675.) The current ALUCP for the Airport was adopted on January 25, 2010 and amended twice on March 4, 2010 and December 1, 2011. In accordance with State Law, General Plan Guidelines (California Government Code Subsection 65302(f) and 65302.3) explicitly require local land use authorities (in this case, City of Carlsbad and the County) to either modify their respective general plans, specific plans and ordinances (including zoning designations) to be consistent with the ALUCP or to take special steps to overrule the findings of the ALUC.

At this time, it is not known how the ALUCP, which is published by the San Diego County Regional Airport Authority (SDCRAA), would be updated to reflect the Master Plan Update. Upon a decision of a selected alternative by the County Board of Supervisors, County staff will initiate revisions to the Airport Layout Plan in consultation with the SDCRAA. Furthermore, at this time it is not known how the ALUCP revisions by the SDCRAA would affect the City of Carlsbad General Plan and associated documents. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

I75-168 As stated in the PEIR, the Master Plan Update is a long-term planning document, and the exact scope, scale, and timing for implementation of each proposed element are not yet defined because project-specific information has not been fully developed to quantify exact impacts. Additional analysis under CEQA will be required for projects at the time that they are designed and proposed. For this reason, it is more appropriate to determine mitigation type and implementation schedule prior to each impact occurring instead of defining a schedule in the programmatic impact analysis without knowing future availability of compensatory mitigation options and without knowing the NC MSCP status. As noted the PEIR Section 2.2, consultation with the resource agencies and implementation of project-specific mitigation would occur at the time when individual projects are funded, designed, and proposed for construction. No changes to the PEIR have been made in response to this comment.

Regarding RWQCB Order 96-13, please refer to **Response to Comment I75-5**.

I75-169 Please refer to **Master Response 10 (Program-level vs. Project-level Review)**.

I75-170 In response to this comment, the contact information of the commenter has been added to receive notice of preparation of CEQA or NEPA documentation for Palomar Airport projects.

- I75-171** At this time, it is not known how the ALUCP, which is published by the San Diego County Regional Airport Authority (SDCRAA), would be updated to reflect the Master Plan Update. Upon a decision of a selected alternative by the County Board of Supervisors, County staff will initiate revisions to the Airport Layout Plan in consultation with the SDCRAA. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment
- I75-172** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-173** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-175** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-175** Please refer to **Master Response 1 (Recirculation of the EIR)**.
- I75-176** Compatibility of land use in RPZ is the responsibility of the San Diego Regional Airport Authority (Authority) and ultimately the City. The County's Master Plan Update and the resultant ALP will not establish land use restrictions in RPZ areas. The County does have responsibilities as the recipient of funding from the FAA to address compatible land use in RPZ areas and will take action consistent with FAA requirements. FAA requirements addressing RPZ are available on the FAA's website.

Consistent with these requirements, the County will make an effort to acquire property interests in areas subject to RPZ. When it is not feasible to obtain a sufficient property interest, the County will work with the SDCRAA and City of Carlsbad to encourage that compatible land uses are ensured through zoning or other land use restrictions. In addition, it is simply too early to tell whether or not an incompatible land use will arise for RPZs that do not exist and which may not be needed for years to come. Similarly, the County has no way of knowing if the FAA would ever seek land use restrictions from the City for land within RPZ or what authority the FAA would have to make or enforce such a request.

The County will make an effort to acquire property interests in RPZ in a manner that is consistent with FAA requirements. These interests could range from acquisition of fee title to an easement acceptable to the FAA. If land use restrictions are sought by the County for RPZ properties, this would likely take the form of a request that the City implement land use restrictions consistent with the ALUCP adopted by the Authority. It would be pure speculation for the County to try and guess what types of land use restrictions the Authority will recommend for RPZ in an ALP that doesn't currently exist.

When an ALP is approved by the FAA, it will be used by the Authority as a basis for the Airport Land Use Compatibility Plan for the Airport (ALUCP). The City of Carlsbad (City) is thereafter required to bring the City's zoning and land use

documents into conformance with the ALUCP or overrule the ALUCP requirements. The ALP does not establish any land use restrictions. Without knowing what the ALP will show or what land use restrictions may be proposed by the Authority and accepted by the City, it's not possible to predict the land use impacts. No revisions to the PEIR have been made in response to this comment.

- I75-177** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-178** The first statement is a general statement related to CEQA and what is required to be determined by the decision-makers (County Board of Supervisors). The County is unclear the purpose of the proposed revisions. Therefore, no further response is required.
- I75-179** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-180** Regarding the Proposed Project and potential “risk upsets,” upon notification or discovery of a potential risk to public health or the environment, an evaluation will be made of the potential risk and the appropriate remedial action will be initiated.

Pursuant to FAA 14 CFR Part 139, the County is required to maintain a current Airport Certification Manual (ACM), including an Airport Emergency Plan, which is designed to meet FAA rules and regulations. The ACM provides clear direction and identifies responsibilities in the day-to-day operation of the Airport, and it outlines operating procedures to address routine matters, unusual circumstances, or emergencies that may arise. The ACM is required by FAA as a component of the Airports Class I Part 139 Certification status, which allows for commercial airline service. Individual sections of the ACM are updated on an as-needed basis with FAA approval. The most recent revisions were approved by FAA in August 2017 as reflected in the applicable sections. Specifically, Chapter 11 of the ACM outlines the requirements for handling hazardous materials at the Airport, and the level of training required. The ACM is essential to ensure safe and efficient operation of the Airport. Chapter 13 of ACM encompasses the Airport Emergency Plan as outlined in FAA AC 150/5200-31, which has been approved by FAA. At the time of this writing, the Airport Emergency Plan is being revised; however, for security reasons it is not available for release to the public.

All business entities that handle, store, or dispose of hazardous materials in prescribed quantities must prepare a Hazardous Materials Business Plan (HMBP). The HMBP is enacted as soon as there is a fire or explosion, or an accidental hazardous material is released into the environment. HMBPs must be prepared as outlined by Chapter 6.95 of the California Health and Safety Code (H&SC) and/or the County Code Section 68.1113 and at a minimum, should contain an inventory of hazardous materials, an emergency response plan, and an employee training program. HMBPs are submitted to the County Department of Environmental Health's (DEH) Hazardous Materials Division and revised or amended every three years. However, HMBPs can be amended sooner if there is a 100 percent increase in any hazardous material listed on the inventory, a threshold is exceeded for a previously

undisclosed hazardous material, a change in the storage, location or use of a hazardous material, or a change in the business name, address, or ownership. The Airport handles, stores, and disposes of hazardous materials. As such, it is required to maintain and update a HMBP.

- I75-181** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-182** The alternative presented by the commenter was not included in the PEIR as a feasible alternative. This comment identifies a theoretical scenario that cannot be anticipated or modeled, and as this comment does not raise an environmental issue related to the adequacy of the PEIR, no further response is warranted.
- I75-183** The commenter asks for a full list of the relevant FAA D-III design standards and which standards the D-III Modified Standards Alternative do not meet. As discussed on page 4-8 of the Draft PEIR, the D-III Modified Standards Alternative is fully analyzed to CEQA's extent. No further discussion necessary.
- I75-184** This comment requests aircraft operations data, and it identifies a theoretical scenario that cannot be anticipated or modeled. As this comment does not raise an environmental issue related to the adequacy of the PEIR, no further response is warranted.

Regarding the MALSR navigational lighting system, an analysis of project impacts associated with the MALSR relocation on the Eastern Parcel was included in the recirculated portions of the PEIR. No further response is required. Regarding consultation with USFWS and CDFW, an agreement was reached on a hardline development footprint and mitigation strategy on October 28, 2010, and is memorialized in a letter dated March 1, 2011. This letter was discussed and attached in the published PEIR. Further consultation with the resource agencies and implementation of project-specific mitigation would occur at the time that individual projects are funded, designed, and proposed for construction. No changes to the PEIR have been made in response to this comment.

- I75-185** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-186** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-187** The commenter states that the Master Plan Update projects will allow larger jets to operate at the Airport, creating significant noise impacts. As discussed in Section 2.4.2.2, the noise analysis completed for the PEIR indicates that the noise impacts associated with future aircraft operations and operation of the Airport would be less than significant.

Regarding the ALUCP, please refer to **Response to Comment I75-167**.

Regarding the Airport Layout Plan (ALP), the comment asks the County to provide information related to the previous and proposed ALPs. While ALPs provide an

engineered drawing of an airport sponsor's proposed improvements, it is not the subject of the PEIR as information related to the Master Plan Update is provided in Chapter 1 of the PEIR. Upon a decision of a selected alternative by the County Board of Supervisors, County staff will initiate revisions to the ALP in consultation with the FAA and SDCRAA, as appropriate.

The comment does not provide evidence that the project would have a significant effect on the environment. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project, and no further response is required.

- I75-188** The commenter asks for the analysis of the Public Shift Alternative in the final Master Plan Update and PEIR. As discussed in the Summary of the PEIR, the Public Comment Alternative proposes shifting the runway approximately 300 feet to the east as well as 123 feet to the north.

In order for the runway's east end RSA and ROFA to meet full FAA design standards they would require a significant amount of grading to meet the minimum slope as the difference in height from the end of the existing blast pad to the limit of the future RSA is approximately 70 feet. The shift of the runway to the east would also reduce the available length of the future runway extension by several hundred feet. One of the goals of the Master Plan Update improvement projects is to increase the distance between Taxiway A and the runway to allow aircraft to use both facilities simultaneously.

In accordance with Section 15126.6 of the CEQA Guidelines, if the environmentally superior alternative is the "no project" alternative, an EIR shall also identify an environmentally superior alternative among the other alternatives". Since the No Project Alternative was first identified as the environmentally superior alternative, CEQA mandates that the PEIR identify the next environmentally superior alternative from the remaining project alternatives. In this case, that alternative is the D-III Modified Standards Compliance alternative.

In accordance with Section 15126.6 of the CEQA Guidelines, an EIR need not consider every conceivable alternative to the Proposed Project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. The Draft PEIR analyzed six alternatives. This comment identifies an alternative that is not identified as feasible and as this comment does not raise an environmental issue related to the adequacy of the PEIR, no further response is warranted.

- I75-189** The comment requests any changes to the navigational lighting system be identified as part of the Master Plan Update elements. The PEIR does include the navigation lighting system identified in PEIR Section 1.2.1 as a component of several project elements.

Regarding coordination with the wildlife agencies, please refer to **Response to Comments I75-191 and I75-192**.

The comment also requests information pertaining to future grants over the next 20-year planning cycle. This constitutes a request for information; the comment does not pertain to the sufficiency or adequacy of the PEIR impacts or mitigation measures.

Please also refer to **Master Response 10 (Program-level vs. Project-level Analysis)**.

- I75-190** The County acknowledges that coordination with the County Department of Public Works, Landfill Management Division, and the RWQCB would be conducted when implementing project-specific components of the Master Plan Update that would encounter inactive landfill material.

The comment also includes a request for information related to property ownership, which is not associated with the adequacy or analysis of the PEIR. Also, please refer to **Master Response 6 (Existing Airport Activity)**, which explains that the PEIR analyzes potential environmental impacts associated with the Master Plan Update and is not required to analyze existing Airport operations not associated with the Proposed Project.

Regarding RWQCB Order 96-13, please refer to **Response to Comment I75-5**.

- I75-191** The comment states that preservation is not an allowable mitigation method. To the contrary, the County has previously worked with the wildlife agencies (USFWS, CDFW) to identify suitable mitigation, and preservation of habitat that is not already protected is an acceptable method of mitigation. No changes were made to the PEIR in response to this comment.

This comment also states that the provisions (presumably mitigation) do not include reporting requirements. To the contrary, reporting requirements would be dictated by the wildlife agencies, as needed. Also, as part of the Final PEIR, a Mitigation Monitoring and Reporting Program would be implemented documenting the County's compliance with all mitigation.

Regarding RWQCB Order 96-13, please refer to **Response to Comment I75-5**.

- I75-192** This comment requests that pre-construction surveys for coastal California gnatcatcher be conducted by an independent qualified biologist funded by the County. The County routinely utilizes qualified consultants to perform various technical studies and surveys, including biological resources. Also, surveying of threatened or endangered species requires a specific permit by the U.S. Fish and Wildlife Service (USFWS). The Proposed Project is no different, and the County intends to retain a qualified biologist permitted by the USFWS to conduct surveys for coastal California gnatcatcher. Furthermore, this comment does not pertain to the sufficiency or adequacy of the PEIR impacts or mitigation measures. No changes to the PEIR have been in response to this comment.

- I75-193** Please see **Response to Comments I75-191**. No changes to the PEIR have been in response to this comment.

- I75-194** This comment requests noise levels for specific aircraft operations and requests the County to identify single noise events on threatened species. First, the PEIR analyzed aircraft operations for the Airport through 2036, and it is not required to isolate aircraft operations or aircraft types as requested in this comment. Second, it

should be noted that coastal California gnatcatcher currently exist within the Airport boundary immediately northwest of the runway. As noted in **Master Response 6 (Existing Airport Activity)** discussing existing Airport activity, aircraft operations are an existing ongoing intended use at the Airport. The Airport Master Plan Update proposes safety and operational efficiency improvements within the current airfield, and the Airport would continue to conduct activity similar to current conditions. Lastly, the standard 60 dBA threshold applied to sensitive avian species, such as the coastal California gnatcatcher, was established based on the level of continuous noise required to mask breeding calls (*Effects of Traffic Noise and Road Construction on Birds, Caltrans 2016*). Noise effects to avian species are highly variable depending on season, species, and individual tolerances. In this sense, it is not practical or feasible to assess noise impacts to sensitive birds using the methods requested in this comment. No changes to the PEIR have been made in response to this comment.

- I75-195** This comment requests Impact BI-3 be revised to state that impacts would be less than significant if timely and successful mitigation is created. Table S-2 was prepared according to the County guidelines for preparing Environmental Impact Reports, which states this table must include “each environmental effect of the proposed project found to be significant, the mitigation measures that would reduce or avoid that effect, and the conclusion as to whether the effect is reduced below a level of significance by applying the mitigation measures [emphasis added] (mitigation effectiveness).” Therefore, the PEIR is correct in stating the impacts, proposed mitigation, and whether the impact could be reduced after implementation said mitigation. No changes to the PEIR have been made in response to this comment.

The comment also asks how mitigation will be scheduled. The timing and schedule of mitigation would be identified once the exact scope, scale, and timing of each proposed element are defined. It is more appropriate to determine the mitigation implementation schedule prior to each impact occurring instead of defining a schedule in the programmatic impact analysis without knowing future availability of compensatory mitigation options and without knowing the NC MSCP status. As noted the PEIR Section 2.2, consultation with the resource agencies and implementation of project-specific mitigation would occur at the time that individual projects are funded, designed, and proposed for construction. No changes to the PEIR have been made in response to this comment.

- I75-196** The commenter states that their previous comments have been incorporated by reference. Accordingly, please refer to **Response to Comment I75-91 through I75-95**.

- I75-197** This comment includes excerpts from the PEIR’s impact and mitigation for hazardous materials. No response is required.

This comment cites the historical placement of the inactive landfill as well as the permitting and ongoing monitoring and reporting associated with the inactive landfill. The comment provides quotes and citations to RWQCB Order No. 96-13, previous RWQCB staff reports, and previous County monitoring reports. As the inactive landfill is part of the Airport’s existing conditions, this information is provided as background by the commenter. No changes to the PEIR were made in response to this comment.

The Airport is located within the Encinas Hydrologic Unit. The RWQCB's Basin Plan designates that the groundwater in this basin is not of adequate quality to be considered for beneficial use. This determination was made based upon the naturally-occurring high levels of chloride and total dissolved solids within the entire basin, not just underneath the landfill. Water Quality Objectives are established to protect beneficial uses. Therefore, although constituent concentrations may exceed the WQPS, they do not impact existing or potential beneficial uses of groundwater in the Encinas Basin as defined by the RWQCB.

The inactive landfill was closed in 1975 under the regulations in force at that time; therefore, 27 CCR Section 20960 does not apply (see 27CCR Section 20950(a)(1) Applicability). As required under RWQCB Order 96-13, the County maintains mechanical erosion control on a regular basis. Furthermore, the County has been performing groundwater monitoring at the inactive landfill on a semi-annual basis since 1991. No significant changes in groundwater conditions were observed. No further response is required.

Please refer to **Response to Comment I75-5** for a discussion of RWQCB Order No. 96-13. The County acknowledges that as individual project elements are proposed that may encounter inactive landfill materials during construction, engineering design plans would be needed to address potential impacts to the integrity of any portion(s) of the landfill cover, existing sub-drain system, or water quality monitoring system. Furthermore, as described in the PEIR, the exact scope, scale, and timing for construction of the Master Plan Update elements will be determined once funding is identified for project design engineering and construction. Therefore, the associated environmental impact for each element, and the Master Plan Update as a whole, is analyzed at a programmatic level for the purpose of environmental analysis. Additional analysis under CEQA will be required for projects at the time that they are designed and proposed. No changes to the PEIR were made in response to this comment.

Please refer to **Master Response 5 (Airport Expansion/Public Vote)** for discussion of the term "airport expansion." No changes to the PEIR were made in response to this comment, and no further response is required.

While the PEIR and Master Plan Update discuss potential construction methods over the inactive landfill, the conceptual construction strategy is preliminary since engineering design plans have not been developed. Also, please refer to **Master Response 10 (Program-level vs. Project-level Review)** regarding project-level and program-level environmental review. No changes to the PEIR were made in response to this comment.

The comment requests the PEIR Mitigation Measure M-HZ-1 be revised to cite other earthwork activities that could trigger the need to implement M-HZ-1. Mitigation Measure M-HZ-1 was written with the intent that any earthwork activities over the inactive landfill units or other areas of known contaminated soil and/or groundwater would require implementation of M-HZ-1. Furthermore, the County's Grading Ordinance, section 87.803 defines grading as "any excavating or filling or combination thereof and shall include the land in its excavated or filled condition." It also defines excavation as "any act by which soil, sand, gravel or rock is cut into, dug, quarried, uncovered, removed, displaced or relocated and shall include the

conditions resulting therefrom.” Therefore, the PEIR is adequate without modification, and no revisions were made in response to this comment. The comment also references an “underground fire” that occurred in the inactive landfill Unit 3. Please refer to **Response to Comment I75-40** for a discussion of this event, which the County refers to as subsurface oxidation. It should be noted that the commenter’s request for additional information on the previous landfill event has no bearing on the Proposed Project. No changes to the PEIR were made in response to this comment.

- I75-198** This comment discusses the commenter’s understanding of the type of waste present within the inactive landfill cells and County obligations. Please refer to Hazards and Hazardous Materials Section 2.3.1 Existing Conditions for a full discussion on applicable laws and regulations pertaining to the oversight of the inactive landfill and its contents. Also refer to **Response to Comment I75-5** for a discussion of RWQCB Order No. 96-13.

Regarding waste removal and work safety, the PEIR Mitigation Measure M-HZ-1 states, “a Soil Management Plan (or equivalent remediation plan) shall be prepared in accordance with applicable federal, state, and local requirements for the purpose of removing, treating, or otherwise reducing potential contaminant concentrations to below human or ecological health risk thresholds. The Soil Management Plan (or equivalent remediation plan) shall outline methods for characterizing and classifying soil for off-site disposal, as needed, during site development.” No changes to the PEIR were made in response to this comment.

Regarding the draft report by SCS Engineers dated October 2013, this topic was previously raised by the commenter. Please see **Response to Comment I75-4**. No changes to the PEIR were made in response to this comment. Regarding the cost estimate, CEQA does not require an environmental document to analyze the cost of a project. No further response is required.

This comment also discusses SANDAG’s evaluation of transportation projects associated with ballot measures. As this comment does not provide information related to the PEIR, no further responses is required.

This comment states the commenter’s disagreement with the 2013 Runway Feasibility Study conducted for the Airport, including the economic projections. While this study was used to inform the Master Plan Update, the economic projects are not associated with an environmental issue with the PEIR analysis or proposed mitigation. Therefore, no changes to the PEIR have been made in response to this comment.

- I75-199** Regarding the October 2013 SCS Engineers report, this topic was previously raised by the commenter. Please refer to **Response to Comment I75-4**. No changes to the PEIR were made in response to this comment.

- I75-200** Please see **Master Response 10 (Program-level vs. Project-level Review)**.

- I75-201** Regarding the draft report by SCS Engineers dated October 2013, this topic was previously raised by the commenter. Please see **Response to Comment I75-4**. No changes to the PEIR were made in response to this comment.

Regarding project-level and program-level environmental review, please refer to **Master Response 10 (Program-level vs. Project-level Review)**. No changes to the PEIR were made in response to this comment.

The PEIR was prepared in accordance with CEQA Guidelines Section 15126.6, which states that an EIR must describe a range of reasonable alternatives to the Proposed Project. Accordingly, the PEIR was prepared pursuant to CEQA Guidelines by describing the Proposed Project and providing other alternatives as described in the Master Plan Update for consideration and environmental analysis. No changes to the PEIR were made in response to this comment.

The comment further summarizes the commenter's opinion of the PEIR analysis. In addition, the comments provide quotes, citations, and commentary on the draft report by SCS Engineers dated October 2013. As discussed above, this topic was previously raised by the commenter. Please see **Response to Comment I75-4**. No changes to the PEIR were made in response to this comment.

I75-202 Regarding RWQCB Order 96-13, please refer to **Response to Comment I75-5**. Any excavation that passes through inactive landfill material will be performed with proper regulatory agency oversight. Excess materials generated during potential drilling will be characterized, properly handled, and disposed in an appropriate fashion. The website references provided in this comment are related to the above-ground burning of trash, where individuals can come in contact with smoke and ash. They do not address the subsurface oxidation of compacted inactive landfill material.

The comment asks how the County intends to comply with RWQCB Order No. 96-13, where inactive landfill material is currently located, how the runway extension would affect the inactive landfill, and why further analysis should be deferred. The comment also asks the County to address multiple referenced website regarding the burning of trash. Please refer to **Response to Comment I75-5** for a discussion of RWQCB Order No. 96-13. Regarding the design of project elements over the inactive landfill, please refer to **Response to Comment I75-197**. The PEIR further clarifies that the conceptual construction strategy of displacement column piles is preliminary since engineering design plans have not been developed. Also, please refer to **Master Response 10 (Program-level vs. Project-level Review)** regarding project-level and program-level environmental review. No changes to the PEIR were made in response to this comment.

Lastly, the internet links referenced in this comment are related to above-ground burning of trash, in which individuals can come in contact with the smoke and ash. These references do not address the subsurface oxidation of compacted landfill material as occurred at the Airport. Furthermore, the County is not required to address any and all references cited by a commenter. Rather, it is the commenter's responsibility to extract and include the information relevant to comments pertaining to the PEIR's published analysis.

I75-203 Please refer to **Master Response 6 (Existing Airport Activity)**.

I75-204 The comment requests for the County to prove that the slopes surrounding the Airport contain inactive landfill materials which prevent the permanent landscaping of the slopes. First, the enhancement of existing Airport slopes is not a component of the Master Plan Update. Please refer to **Master Response 6 (Existing Airport**

Activity) in which it is described that the Master Plan Update and associated PEIR were prepared to analyze the Airport's future while enhancing operations and safety, and the County is not required to analyze the Airport's current effects on existing conditions. Second, as noted in the PEIR Section 2.1.2.1, the State's published Inspection Guidance for State Minimum Standards at Closed, Illegal, and Abandoned Disposal Sites identifies the requirements for maintaining of inactive landfills, which precludes implementation of irrigation and landscaping of slopes that contain inactive landfill materials. Third, please refer Comment Letter S4 (RWQCB) in which it states, "Permanent pressurized irrigation lines should not be installed on the surface of the landfill, including the slopes. Any leakage of pipes, valves, and irrigation meters, may be create [sic] conditions that may be considered an illicit discharge by the San Diego County Solid Waste Local Enforcement Agency and the San Diego Water Board." Lastly, borings conducted for the vapor extraction probes installed at the top of the Airport's perimeter slope confirms the presence of inactive landfill materials in those locations. The boring logs and vapor extraction system layout report from 1994 are posted along with other Palomar landfill maps and reports on the State's Geotracker website:

https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=L10003501496

Regarding RWQCB Order No. 96-13, please refer to **Response to Comment I75-5**. As this comment does not provide evidence of an error in the CEQA analysis or evidence of a new significant effect, no changes to the PEIR have been made in response to this comment.

As stated in the PEIR, the landfill was closed in 1975 and was capped and filled with soil and/or asphalt pavement. In addition, a gas collection control system (GCCS) was installed to collect and diffuse landfill gas. The landfill GCCS is inspected monthly by the County Department of Public Works for leaks and damage as well as monitoring wells that are monitored semi-annually. The RWQCB changed the landfill classification from Category 1 to Category 2 on July 12, 2016, meaning there is a reduced risk to drinking water (see PEIR Appendix C). Currently, the perimeter slopes are seeded with a native seed mix and function as the protective cap (cover) for the inactive landfill underlying portions of the Airport boundary. The protective cap is a non-permeable layer consisting of approximately three feet of clay rich soils that are designed to exclude water infiltration.

At this time, the County does not currently anticipate implementing erosion control measures as part of the proposed Master Plan Update. The Master Plan Update is intended to anticipate aviation growth and associated facility improvements over the next 20-year planning period, and it does not include (nor is it intended to include) ongoing maintenance functions of the Airport or inactive landfill.

I75-205 The commenter asks for an explanation as to why no significant noise impacts were identified in the aircraft noise analysis. As discussed in Section 2.4.2.1 of the PEIR, a significant impact from aircraft noise would arise if noise sensitive areas located in areas exposed to CNEL 65 dB to experience a noise increase of at least CNEL 1.5 dB when compared to the No Project Alternative for the same timeframe. This includes an increase from CNEL 63.5 dB to CNEL 65 dB over a noise sensitive area. There are no noise sensitive land uses located in areas immediately adjacent to the Airport. The analysis determined that two individual elements of the Proposed

Project would change the nature of noise around the airport: the northerly shift of Runway 06-24 by 123 feet, and the implementation of a phased runway extension to the east. These components would result in minor adjustments to the flight tracks, which would be reflected in the noise contours shown on Figures 2.4-4 and 2.4-5. Changes in the fleet mix serving the Airport, including the introduction of business jets that would remain in the Airport noise environs for a shorter period of time, is another factor that was included in the noise analysis. As a result of these variables, the future year noise contours as depicted on Figures 2.4-4 and 2.4-5 would shift slightly north and to the east, but not far enough to introduce noise sensitive land uses to CNEL levels above the threshold of significance.

The PEIR also analyzes noise from several other perspectives, see Sections 2.4.2.2. Project Generated Airborne Noise, Section 2.4.2.3. Construction Activities, and Section 2.4.2.4 Ground-borne Vibration.

The commenter also states the PEIR failed to include a single event noise analysis as indicated in the court decision in *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners*. In review of this court decision, it does not impose any universal requirements pertaining to preparation of supplemental noise analysis. The facts of the court decision were distinguishable and the holding does not apply to the Proposed Project. Please also refer to **Response to Comment L3-67**. Furthermore, the PEIR Section 2.4.2 discusses that potential noise impacts associated with the Proposed Project were studied using standard tools, methodologies, and significance criteria for aircraft noise as established by the FAA. Specifically, FAA Order 1050.1F Desk Reference (Section 11.4) explains that DNL (or CNEL as explained in the PEIR) is the recommended metric for analyzing aircraft noise exposure, and should continue to be used as the primary metric. It also states there are no new metrics of sufficient scientific standing to substitute for DNL/CNEL. FAA criteria require that the determination of significance must be analyzed through the use of noise contours along with local land use information and general guidance contained in Appendix A of 14 CFR Part 150. Preparation of noise contours associated with an airport and aviation projects is the standard means of assessing potential noise impacts under both state and federal guidance. Accordingly, preparation of noise contours for purposes of identifying potential noise impacts associated with the Proposed Project is sufficient. Therefore, the analysis in the PEIR is valid and no revisions were made.

As noted in FAA Order 1050.1F Desk Reference, supplemental noise measurements, such as single events, may be conducted to assist in the public's understanding of the Airport's noise conditions. Therefore, although single noise events are not used as the County's threshold of significance, the County continues to consider single noise events through the existing VNAP measures in consultation with the community and local residents. Furthermore, the noise analysis indicates that noise sensitive land uses would not experience noise levels above the significance threshold under either the PAL 1 or PAL 2 scenarios evaluated for the Proposed Project. Accordingly, preparation of a supplemental noise analysis is not warranted.

The commenter states that the PEIR ignores the noise that would be generated by an increased number of automobile trips. However, as discussed in Section 2.4.2.2,

the analysis of airborne noise from roadway traffic associated with future year conditions would be less than significant. No further response is required.

- 175-206** Regarding the Proposed Project and potential “risk upsets,” upon notification or discovery of a potential risk to public health or the environment, an evaluation will be made of the potential risk and the appropriate remedial action will be initiated.

Pursuant to FAA 14 CFR Part 139, the County is required to maintain a current Airport Certification Manual (ACM), including an Airport Emergency Plan, which is designed to meet FAA rules and regulations. The ACM provides clear direction and identifies responsibilities in the day-to-day operation of the Airport, and it outlines operating procedures to address routine matters, unusual circumstances, or emergencies that may arise. The ACM is required by FAA as a component of the Airports Class I Part 139 Certification status, which allows for commercial airline service. Individual sections of the ACM are updated on an as-needed basis with FAA approval. The most recent revisions were approved by FAA in August 2017 as reflected in the applicable sections. Specifically, Chapter 11 of the ACM outlines the requirements for handling hazardous materials at the Airport, and the level of training required. The ACM is essential to ensure safe and efficient operation of the Airport. Chapter 13 of ACM encompasses the Airport Emergency Plan as outlined in FAA AC 150/5200-31, which has been approved by FAA. At the time of this writing, the Airport Emergency Plan is being revised; however, for security reasons it is not available for release to the public.

All business entities that handle, store, or dispose of hazardous materials in prescribed quantities must prepare a Hazardous Materials Business Plan (HMBP). The HMBP is enacted as soon as there is a fire or explosion, or an accidental hazardous material is released into the environment. HMBPs must be prepared as outlined by Chapter 6.95 of the California Health and Safety Code (H&SC) and/or the County Code Section 68.1113 and at a minimum, should contain an inventory of hazardous materials, an emergency response plan, and an employee training program. HMBPs are submitted to the County Department of Environmental Health’s (DEH) Hazardous Materials Division and revised or amended every three years. However, HMBPs can be amended sooner if there is a 100 percent increase in any hazardous material listed on the inventory, a threshold is exceeded for a previously undisclosed hazardous materials, a change in the storage, location or use of a hazardous material, or a change in the business name, address, or ownership. The Airport handles, stores, and disposes of hazardous materials. As such, it is required to maintain and update a HMBP.

- 175-207** The comment requests an explanation why the PEIR did not include vehicle trips generated from non-commercial aviation activities (i.e., general aviation) in its transportation analysis, and states it is not appropriate to omit this.

It should be clarified that non-commercial aviation activities were partially included in the transportation analysis, and the County acknowledges this should be further clarified as described in this response. The County chose the high growth forecast for commercial passenger enplanements based on past applications for service that have been submitted and which admittedly did not come to fruition. Nevertheless, since interest had been shown in establishing commercial service at these levels the County endeavored to plan for activity at this level to ensure potential impacts are

fully addressed even if potentially overstated. There are a number of reasons why a small regional airport may experience growth in commercial enplanements. It would be pure speculation for the County to identify one or more of these factors as contributing to as yet unrealized growth at this point in time. Please also refer to **Master Response 8 (Commercial Airline Service)**.

As stated on page 2-108 of the Draft PEIR, the Master Plan Update does not propose any changes to the non-commercial uses at the airport. This is because the County has no discretion or enforcement over non-commercial aviation activity. Therefore, no additional trips would be generated by the non-commercial uses at the airport as a result of the Master Plan Update. The increase in vehicle trips associated with the Master Plan Update correlate only with the increase in enplanements because that is the only method of aviation the County can control.

Nonetheless, because the airport's surrounding roadways were studied under existing conditions, vehicle trips generated for all aviation activities (i.e., commercial and non-commercial) were included in the CEQA baseline conditions. Under the near-term conditions, the transportation analysis then added the anticipated vehicle trips generated from commercial enplanements to the near-term conditions. And lastly, the long-term forecasted transportation volumes were developed by adding the anticipated vehicle trips from commercial enplanements to SANDAG's long-term projections.

- I75-208** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-209** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-210** The comment includes a discussion by the commenter of critical design aircraft with no comments associated with the PEIR. The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-211** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-212** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.
- I75-213** Chapter 4, Alternatives, of the PEIR analyzed the No Project Alternative, where the improvements stated in the Master Plan Update would not occur and operations of the Airport would continue. While the No Project Alternative would result in reduced environmental impacts, except for traffic, compared to the proposed project, the No Project Alternative would not meet or achieve all of the Project's Objectives. No revisions were made to the PEIR in response to this comment.

- I75-214** The PEIR adequately addresses potential environmental impacts associated with construction and operation of the Master Plan Update. Although relocation of existing MALSRS navigational lighting was discussed in the Draft PEIR, it was revised to address potential impacts to biological resources on the Eastern Parcel. The remainder of the comment includes requests for information but it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

Please also refer to **Master Response 10 (Program-level vs. Project-level Analysis)**.

- I75-215** The glideslope building and antenna will require relocation in order to remain clear of the future RSA when Runway 06-24 is shifted to the north. The building to be relocated is approximately 360 square feet and would be shifted approximately 50 feet north of its current location to remain clear of the future RSA. Electrical utilities necessary to operate the equipment are already located in the proposed relocation area.

The comment requests that this information be included in the final Master Plan Update and PEIR. Please refer to the PEIR, Section 1.2.1.1. No changes to the PEIR were made in response to this comment.

- I75-216** In accordance with FAA AC 150/5210-15A, the ARFF facility would be relocated south of the existing Airport Traffic Control Tower (ATCT) and east of the passenger terminal apron. The facility would encompass approximately 4,664 square feet and would include two vehicle bays, watch room, first aid room, storage room, and administrative offices. The proposed relocation site is currently a vehicle parking lot, and adjacent lots could accommodate the parking spaces lost to the relocation of the ARFF. In the interim prior to improvements, all equipment and personnel necessary to operate and comply with "Index B" standards will be provided at the Airport.

The comment requests that this information be included in the final Master Plan Update and PEIR. Please refer to the PEIR, Section 1.2.1.1. No changes to the PEIR were made in response to this comment.

- I75-217** Please refer to **Master Response 10 (Program-level vs. Project-level Analysis)**.

- I75-218** The information requested includes details outside the scope of the PEIR. Please see the **Master Response 10 (Program-level vs. Project-level Review)**.

- I75-219** Please refer to **Master Response 10 (Program-level vs. Project-level Analysis)**.

In addition, regarding the Proposed Project and potential risk upsets, upon notification or discovery of a potential risk to public health or the environment, an evaluation will be made of the potential risk and the appropriate remedial action will be initiated.

Pursuant to FAA 14 CFR Part 139, the County is required to maintain a current Airport Certification Manual (ACM), including an Airport Emergency Plan, which is designed to meet FAA rules and regulations. The ACM provides clear direction and identifies responsibilities in the day-to-day operation of the Airport, and it outlines operating procedures to address routine matters, unusual circumstances, or emergencies that may arise. The ACM is required by FAA as a component of the

Airports Class I Part 139 Certification status, which allows for commercial airline service. Individual sections of the ACM are updated on an as-needed basis with FAA approval. The most recent revisions were approved by FAA in August 2017 as reflected in the applicable sections. Specifically, Chapter 11 of the ACM outlines the requirements for handling hazardous materials at the Airport, and the level of training required. The ACM is essential to ensure safe and efficient operation of the Airport. Chapter 13 of ACM encompasses the Airport Emergency Plan as outlined in FAA AC 150/5200-31, which has been approved by FAA. At the time of this writing, the Airport Emergency Plan is being revised; however, for security reasons it is not available for release to the public.

All business entities that handle, store, or dispose of hazardous materials in prescribed quantities must prepare a Hazardous Materials Business Plan (HMBP). The HMBP is enacted as soon as there is a fire or explosion, or an accidental hazardous material is released into the environment. HMBPs must be prepared as outlined by Chapter 6.95 of the California Health and Safety Code (H&SC) and/or the County Code Section 68.1113 and at a minimum, should contain an inventory of hazardous materials, an emergency response plan, and an employee training program. HMBPs are submitted to the County Department of Environmental Health's (DEH) Hazardous Materials Division and revised or amended every three years. However, HMBPs can be amended sooner if there is a 100 percent increase in any hazardous material listed on the inventory, a threshold is exceeded for a previously undisclosed hazardous materials, a change in the storage, location or use of a hazardous material, or a change in the business name, address, or ownership. The Airport handles, stores, and disposes of hazardous materials. As such, it is required to maintain and update a HMBP.

Businesses that maintain a Risk Management Plan (RMP) within San Diego County are primarily those that handle chlorine gas (e.g., wastewater treatment plants and refrigeration facilities). The Airport does not handle chlorine gas and is not required to have a RMP.

- I75-220** Palomar airport currently accommodates 130 GA parking spots, of which only 38 are currently leased. There are currently two other GA aircraft parking areas south of the runway. Additional aircraft parking area has been identified south east of taxiway and will be built on demand. No revisions to the PEIR have been made in response to this comment.
- I75-221** The comment requests specific information regarding specific project elements in relation to the runway extension. Please refer to **Master Response 10 (Program-level vs. Project-level Review)**. No changes have been made to the PEIR in response to this comment.
- I75-222** Please refer to **Master Response 6 (Existing Airport Activity)**.
- I75-223** As stated in the PEIR Appendix A (NOP/Initial Study), the NOP for the Proposed Project was released on February 29, 2016, which establishes the baseline for the environmental analysis of the PEIR in accordance with Section 15125 of the CEQA Guidelines. Please also refer to **Master Response 1 (Recirculation of the EIR)**.
- I75-224** The FAA oversees our county's aviation program providing regulations and standards for operating aircraft, they license pilots, and they certify commercial

airports like McClellan-Palomar. The FAA is responsible for air traffic control which includes flight paths, controlling airplanes while they're flying and while they're moving on the ground on the airport's taxiway and runway. While the FAA is a Federal Agency, NEPA analysis is not required.

- I75-225** Regarding consistency determinations with planning documents cited in this comment, please refer to the respective sections of the PEIR, including Sections 2.2 (Biological Resources), 2.5 (Transportation and Traffic), and 3.1.7 (Land Use and Planning). In each of these resources, the PEIR includes consistency determinations with the applicable planning documents.

Regarding the County General Plan, please refer to **Response to Comments I75-27 and I75-28**, and **Master Response 5 (Airport Expansion / Public Vote)**.

Regarding the ALUCP, please refer to **Response to Comment I75-167**.

Regarding the Airport Layout Plan (ALP), the comment asks the County to provide information related to the previous and proposed ALPs. While ALPs provide an engineered drawing of an airport sponsor's proposed improvements, it is not the subject of the PEIR as information related to the Master Plan Update is provided in Chapter 1 of the PEIR. Upon a decision of a selected alternative by the County Board of Supervisors, County staff will initiate revisions to the ALP in consultation with the FAA and SDCRAA, as appropriate.

The comment does not provide evidence that the Proposed Project would have a significant effect on the environment. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project, and no further response is required.

- I75-226** Please refer to **Response to Comment I75-223**.

- I75-227** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

- I75-228** Compatibility of land use within airport RPZs is the responsibility of the San Diego County Regional Airport Authority (SDCRAA) and the City of Carlsbad. The County's Master Plan Update and the resultant ALP will not establish land use restrictions in RPZ areas. The County does have responsibilities as the recipient of funding from the FAA to address compatible land use in RPZ areas and will take action consistent with FAA requirements. Consistent with these requirements, the County will make an effort to acquire property interests in areas subject to RPZ. When it is not feasible to obtain a sufficient property interest, the County will work with the SDCRAA and City of Carlsbad to encourage that compatible land uses are ensured through zoning or other land use restrictions. In addition, it is simply too early to tell whether or not an incompatible land use will arise for RPZs that do not exist and which may not be needed for years to come. Similarly, the County has no way of knowing if the FAA would ever seek land use restrictions from the City for land within RPZ or what authority the FAA would have to make or enforce such a request.

The County will make an effort to acquire property interests in RPZ in a manner that is consistent with FAA requirements. These interests could range from acquisition of fee title to an easement acceptable to the FAA. If land use restrictions are sought by the County for RPZ properties, this would likely take the form of a request that the City implement land use restrictions consistent with the ALUCP adopted by the SDCRAA. It would be pure speculation for the County to try and guess what types of land use restrictions the SDCRAA will recommend for RPZ in an ALP that doesn't currently exist.

When an ALP is approved by the FAA, it will be used by the SDCRAA as a basis for the Airport Land Use Compatibility Plan for the Airport (ALUCP). The City of Carlsbad (City) is thereafter required to bring the City's zoning and land use documents into conformance with the ALUCP or overrule the ALUCP requirements. The ALP does not establish any land use restrictions. Without knowing what the ALP will show or what land use restrictions may be proposed by the SDCRAA and accepted by the City, it's not possible to predict the land use impacts. No revisions to the PEIR have been made in response to this comment.

175-229 This comment requests the date when the cumulative project list was compiled. As noted in the PEIR Section 1.4, the existing environmental setting for the proposed project is 2016, which is when the Notice of Preparation was published for the Proposed Project. Technical studies commenced at that time and began preparing analytical data (including cumulative projects). However, as explained in **Response to Comment L3-74**, it should be noted that several resources analyze future conditions with and without the Master Plan Update for the impact determination in accordance with FAA methodology and guidance.

The comment disagrees with the description of the cumulative project titled, Robertson Ranch. To clarify, the Draft PEIR's description includes 98 housing units; not 99 as noted in this comment. During coordination with the City of Carlsbad on the cumulative project list, City staff provided the project description for Robertson Ranch verifying the project only included 98 multi-family housing units. This description provided by the City of Carlsbad was used for the Draft PEIR analysis. As such, the description reflected in the published Draft PEIR Table 1-4 is correct without revision.

The comment asserts that any emission of criteria pollutants would result in a significant impact because the San Diego Air Basin is currently in non-attainment. Please refer to **Response to Comment 175-57**.

The comment requests the County to identify and demonstrate how the air quality analysis was produced, and to explain the pollutant increases. All emissions associated with the Master Plan Update were disclosed in the PEIR and its Appendix F–Air Quality Impact Technical Report. These documents also included the applicable significance thresholds, which are the County of San Diego Guidelines for Determining Significance for Air Quality (March 19, 2007).

Lastly, this comment refers to City of Carlsbad's comment letter (L3) and requests whether the City's comments are correct. For all responses to the City of Carlsbad's letter, please refer to **Response to Comment L3**.

- I75-230** Regarding the County and City General Plans, please refer to **Response to Comment L3-38**, which explains that PEIR Section 2.1.1 was intended to note that because the Airport is located within the City of Carlsbad, the County does not have a zoning or General Plan land use designation for the Airport.

However, the Master Plan Update will serve as the facility plan which identifies land uses at the Airport. In addition, the County applies policies pertaining to County airports and other facilities from the County General Plan. Local land use policies are also reviewed and will be considered whenever possible consistent with the County's obligations to the federal government as a grant recipient. Nonetheless, the County still retains land use authority over the Airport.

Furthermore, as described in the PEIR Section 3.1.7.1.2, the Airport is located on County-owned property within the municipal limits of the City of Carlsbad and is zoned Industrial (M) pursuant to the Carlsbad Municipal Code (CMC) Title 21 "Zoning Ordinance" (Section 21.34) and consists of government (airport) facility land uses. No changes to the PEIR have been made in response to this comment.

- I75-231** As discussed in Section 2.1.2.1 of the PEIR, the Proposed Project would not irrigate or landscape the eastern edge slope along the inactive landfill. The PEIR included several factors that prevented implementation of irrigation and landscaping of this slope, other than potential groundwater contamination concerns.

This information was included in the PEIR and the landfill classification change does not change the feasibility of providing landscaping and irrigation on these slopes. No revisions to the PEIR were made in response to this comment.

- I75-232** The commenter incorporates by reference all of their previous biological mitigation related comments. As such, please refer to those applicable responses.

- I75-233** The commenter provides their understanding of CEQA requirements, the Master Plan Update, and the onsite inactive landfill. The comment does not provide information related to the PEIR's analysis. No changes were made in response to this comment.

The comment also asks several questions regarding public safety and water quality. As noted in **Master Response 6 (Existing Airport Activity)** discussing existing Airport activity, aircraft operations are an existing ongoing intended use at the Airport. The Airport Master Plan Update proposes safety and operational efficiency improvements within the current airfield, and the Airport would continue to conduct activity similar to current conditions.

This comment states the PEIR failed to discuss environmental issues raised within this comment letter (I75). As noted above, the PEIR concluded that a potentially significant impact would occur regarding grading and/or excavation activities over the inactive landfill units or other areas of known contaminated soil and/or groundwater. As a result, Mitigation Measure M-HZ-1 would be implemented to reduce this impact to less than significant. No changes to the PEIR have been made in response to this comment.

The comment asks the County to explain why the Proposed Project was selected over the other alternatives. The PEIR Chapter 4 discusses various alternatives and

thoroughly explains why the Proposed Project was selected. No changes to the PEIR have been made in response to this comment.

This comment asks why the issues raised by this comment letter (I75) would not result in significant impact to water quality, air quality, and safety. Please refer to the specific comments above for responses to these individual points raised. No further response is required.

I75-234 Please refer to **Master Response 3 (Voluntary Noise Abatement Procedures)**.

I75-235 While future private development at the Airport may be subject to discretionary review by the City of Carlsbad, the County maintains land use authority over public improvements such as the Airport. Section 2.1.1 was intended to note that because the Airport is within the City of Carlsbad, the County's General Plan does not have a zoning or land use designation for the Airport. Nonetheless, the County still retains land use authority over public improvements.

Furthermore, as described in the PEIR Section 3.1.7.1.2, the Airport is located on County property within the municipal limits of the City of Carlsbad and is zoned Industrial (M) pursuant to the Carlsbad Municipal Code (CMC) Title 21 "Zoning Ordinance" (Section 21.34) and consists of government (airport) facility land uses. The County has immunities from the City's land use restrictions (see, for example, Government Code Section 53090, et seq.); however, the County will continue to coordinate with the City in an effort to ensure City requirements are taken into consideration.

Please refer to **Master Response 3 (Voluntary Noise Abatement Procedures)** and **Master Response 4 (Noise Monitors and PEIR Calculations)**. No revisions to the PEIR have been made in response to this comment.

I75-236 This comment incorrectly states that Chapter 8 (Noise Element) of the County's General Plan does not apply to Palomar Airport or Gillespie Airport. As stated above, the County retains land use authority over public improvements at Palomar Airport. Furthermore, as described in the PEIR Section 3.1.7.1.2, the Airport is located on County property within the municipal limits of the City of Carlsbad and is zoned Industrial (M) pursuant to the CMC Title 21 "Zoning Ordinance" (Section 21.34) and consists of government (airport) facility land uses. The County has immunities from the City's land use restrictions and as such the County's General Plan and the airport's ALUCP are the applicable planning documents that establish noise standards. No revisions are required to the PEIR in response to this comment.

I75-237 The commenter asks that the regulatory requirements section of the PEIR be updated to include the requirements of the *Berkeley Jets* decision. Please refer to **Response to Comment I75-205**. The Court ruled that a project proponent may be required to prepare a supplemental noise analysis as a part of the CEQA process; however, it did not describe how and when such an analysis would be required, leaving this up to individual agencies to determine as appropriate.

The remainder of the comment includes a request for information to the Master Plan Update and PEIR. Regarding traffic volumes, the PEIR Section 2.5.4.1 states that existing traffic conditions were obtained from the City of Carlsbad's 2016 Traffic Monitoring Program. At locations where the City has not collected data, traffic counts

were conducted on June 21, 2017. The PEIR's Transportation Impact Analysis then explains how the Master Plan Update's aviation forecast was applied to existing and future traffic conditions. The request for additional information has been noted, and no further response is warranted.

- I75-238** The commenter states that the planning horizon for the Proposed Project must be updated to 2038. For purposes of this project, the 20-year planning horizon extends from the date analysis began, which is 2016.

Regarding baseline conditions, please refer to **Response to Comment L3-74**.

Regarding non-commercial aviation activity, please refer to **Response to Comment L3-70**, which states the County has no regulatory ability to restrict or otherwise prevent use of this public-use airport by non-commercial aviation activity, including but not limited to general aviation, military, or charter flights. The County has no jurisdiction or enforcement authority to deny safe use of the Airport. Nonetheless, non-commercial aviation activity was analyzed, and potential noise impacts were disclosed in the PEIR and technical studies. The PEIR's Noise Impact Analysis (Appendix D) Table 5 describes the anticipated increase in operations for all aircraft types, including non-commercial. Figure C1 from the Noise Impact Analysis (Appendix D) presents a comparison of existing conditions (2016) to future conditions (2036) including full implementation of the Proposed Project, including forecasted commercial and non-commercial aircraft operations. These exhibits were provided to the public for an understanding of several perspectives on how noise may change in the future planning period, but the CEQA significance determination was based on the analysis discussed in Section 2.4.2. As such, no revisions have been made to the PEIR in response to this comment.

- I75-239** The commenter offers two examples of "noise sensitive land uses" and requests that they be evaluated in the noise analysis for the Final PEIR. The first land use is a restaurant located on the Airport property. Restaurants are not considered noise sensitive uses for purposes of the noise analysis conducted for the Draft PEIR. The second noise sensitive land use is a mobile home park located approximately one to three miles from the Airport. As the mobile home park does not fall within the noise contours produced as part of the noise analysis, it would not be considered impacted by aircraft noise associated with the Proposed Project. The noise analysis conducted for the PEIR indicates that impacts associated with future aircraft operations would be less than Significant. Please see Section 2.4.2.2 for further discussion.

- I75-240** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

- I75-241** The noise analysis conducted for the PEIR includes an analysis of ground borne vibration associated with construction of the Master Plan Update project elements. Please see PEIR Section 2.4.2.4 and Appendix D for further discussion on this topic.

- I75-242** The comment requests information pertaining to existing conditions of the Airport's operation, and the comment does not specifically identify an environmental issue with the PEIR analysis. Therefore, no changes to the PEIR have been made in response to this comment, and no further response is required. Regarding RWQCB Order 96-13, please refer to **Response to Comment I75-5**.

- I75-243** As discussed in Section 2.4.1, San Diego County Code Sections 36.408 and 36.409, *Construction Equipment*, state that:

Except for emergency work, it shall be unlawful for any person to operate construction equipment or cause construction equipment to be operated, that exceeds an average sound level of 75 dBA for an 8-hour period, between 7:00 a.m. and 7:00 p.m., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received.

Once construction limits and methods have been identified for individual Master Plan Update components, they will be evaluated in the context of the PEIR and applicable regulations pertaining to noise.

- I75-244** The comment pertains to existing noise issues unrelated to the Proposed Project (i.e., Master Plan Update or PEIR). As such, no further response is required.

- I75-245** Please refer to **Master Response 4 (Noise Monitors and PEIR Calculations)**.

- I75-246** Linscott, Law, & Greenspan (LLG) were the retained transportation engineers who prepared the Traffic Impact Analysis for the proposed project, included in Appendix E of the PEIR. As stated in the Traffic Impact Analysis, LLG used the SANDAG Series 13 Model forecast as the source for long-term volumes for the study area locations. In addition, LLG utilized SANDAG's *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* (April 2002) in its analysis. Since SANDAG is the regional agency responsible for updating traffic data, use of the SANDAG traffic models in the Traffic Impact Analysis is appropriate as it's the industry-wide standard to use SANDAG's traffic models. Furthermore, the calculation worksheets from the SANDAG model runs are included as technical appendices to the Traffic Impact Analysis for transparency and full disclosure of the technical work conducted for the Traffic Impact Analysis. No revisions to the PEIR were made in response to this comment.

- I75-247** This comment includes a request for information regarding the current trips to and from the Airport, and the type of information the County used in its aviation forecast and vehicle trips. The PEIR appropriately characterizes how existing vehicle trips were studied, and it accurately characterizes the source of vehicle trips (i.e., enplanement generated from commercial airline activity). Please refer to **Response to Comment I75-207**.

- I75-248** The comment requests for simplified language in PEIR Section 2.5.2.3 describing the traffic thresholds for determining significance. This comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation. No changes to the PEIR have been made in response to this comment.

- I75-249** The comment requests the PEIR to explain which parts of the Proposed Project are analyzed at a project-level. To the extent feasible, all elements of the Proposed Project were analyzed under each of the environmental resources defined by CEQA. The data sources and analysis are provided within each chapter of the PEIR that analyzes the respective resources. This comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation. No changes to the PEIR have been made in response to this comment.

Please also refer to **Master Response 10 (Program-level vs Project-level Analysis)** and **Master Response 4 (Noise Monitors and PEIR Calculations)**.

I75-250 Please refer to **Response to Comment I75-207**.

I75-251 The County did not receive or use FAA grants for the preparation of the Master Plan Update or the PEIR. The PEIR includes a Project Objective, not a project alternative selection criteria, that future improvements should adhere to FAA design criteria and be financially reasonable in order to be eligible for FAA grant funding for design and construction. The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-252 Please refer to **Response to Comment I75-235**.

I75-253 According to the County's Guidelines for Determining Significance—Wildland Fire and Fire Protection, the threshold for emergency access states that developments with inadequate access (e.g. long roads with a single access point, roads over steep grades, improper road surfaces, and/or narrow roads) significantly contribute to the inability to effectively evacuate residents during a disaster (wildfire, earthquake, or flood) and provide necessary emergency access for fire, ambulance, or law enforcement personnel (County of San Diego 2010). Since the comment does not provide data or highlight errors in the PEIR in accordance with the correct usage of inadequate emergency access in accordance with CEQA and the County's definition, this comment does not raise an issue to the adequacy or accuracy of the environmental analysis of the PEIR. No revisions to the PEIR are required in response to this comment.

I75-254 Regarding the draft report by SCS Engineers dated October 2013, this topic was previously raised by the commenter. Please see **Response to Comment I75-4**. Also, the County would like to clarify that it does not propose attracting aircraft as stated by the commenter; rather, the aviation forecasts in the Master Plan Update were developed to anticipate foreseeable demand for Airport facilities and infrastructure. As a result, this would help identify which facilities should be improved to meet the projected forecast that is expected to incrementally increase naturally throughout the 20-year planning period whether or not the Master Plan Update is implemented.

Furthermore, this comment does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-255 Regarding the City of Carlsbad General Plan, please refer to **Response to Comment I75-235**.

Regarding the transportation analysis, please see **Response to Comments I75-248 and I75-207**.

Regarding the Airport boundaries and CUP-172, please refer to **Master Response 5 (Airport Expansion / Public Vote)**.

Regarding ARFF, please refer to **Response to Comment I75-150 and I75-216**. The comment also requests project-specific detailed information. Please refer to **Master Response 10 (Program-level vs Project-level Review)**.

I75-256 For all responses to the City of Carlsbad's letter regarding cumulative projects, please refer to **Response to Comment Letter L3**.

I75-257 This comment asserts there are inconsistencies and discrepancies in the air quality data, specifically in Table 12 of the Air Quality Impact Technical Report. This comment asserts neither the PEIR nor Air Quality Impact Technical Report provide the model input data utilized to produce the air quality emissions. The commenter requests to review the model input data. Please refer to the published PEIR Appendix F–Air Quality Impact Technical Report. Appendix A of this technical report (CalEEMod Results and Assumptions) does include the modeling input information.

The comment also asks several questions related to existing methane gas emissions and potential methane gas emissions in the future. As noted in the PEIR, the exact scope, scale, and timing for construction of certain elements will be determined once funding is identified for project design engineering and construction. Areas of impact are estimated for project elements (such as the runway extension), as they have not been developed sufficiently to quantify exact impacts in most cases, and therefore, are analyzed at a programmatic level. Once funding is identified for the design engineering and construction of individual Master Plan Update projects, the exact impact area will be further analyzed. Additional analysis under CEQA will be required for projects at the time that they are designed and proposed.

I75-258 This comment questions whether CalEEMod Version 2013.2 was the most currently available version of the software. Yes, CalEEMod Version 2013.2 was the most currently available version when the analysis commenced.

I75-259 The comment asserts the PEIR should account for all aircraft operations; not just commercial. As noted in **Master Response 7 (FAA Involvement and Oversight)**, aircraft in flight are under the jurisdiction and regulatory enforcement of FAA. As such, the County does not have the regulatory ability to place restrictions on Airport users or mitigate ongoing aircraft at a public-use airport. The purpose of the PEIR is to review impacts related to the Master Plan Update improvements to County facilities; not to inventory and assess uses of private leaseholds or tenants, and attributing those ongoing operational emissions to the proposed project would be misleading and uninformative.

As ground-facility manager, the County issues leases for commercial service. Therefore, impacts were analyzed only for commercial activity because the County has discretion over the approval of commercial air service leases. Nonetheless, emissions associated with all aircraft operations (including general aviation) were calculated and disclosed in the published PEIR Air Quality Technical Analysis (Appendix F).

I75-260 This comment requests the PEIR be revised to include multiple pieces of information regarding cumulative projects and how the County is responding to the City of Carlsbad's comment letter. For all responses to the City of Carlsbad's letter, please refer to **Response to Comment Letter L3**.

For an analysis of cumulative impacts associated with the Master Plan Update, please refer to the PEIR section for Air Quality, Traffic, and Noise (as noted in this comment) including each of their respective technical reports. This information was disclosed in the published PEIR and its appendices. Regarding air quality analysis pertaining to commercial and general aviation, please refer to **Response to Comment I75-259**. Lastly, as the Master Plan Update is a County-initiated project, the County of San Diego Guidelines for Determining Significance for Air Quality (March 19, 2007) was utilized.

- I75-261** Section 15083 of the CEQA Guidelines requires a lead agency to hold a Scoping Meeting during the public review period of the NOP. However, CEQA does not require that the lead agency prepare response to comments obtained during the Scoping Meeting or submitted during the public review period of the NOP. Furthermore, CEQA does not require the lead agency to reach out to individuals who commented during the Scoping Meeting while preparing the environmental documentation but rather to use that information while constructing the analysis of the environmental document.

In regards to the existing and projected noise levels, please refer to **Master Response 6 (Existing Airport Activity)**, **Master Response 4 (Noise Monitors and PEIR Calculations)**, and **Master Response 3 (Voluntary Noise Abatement Procedures)**.

- I75-262** This comment cites the City of Carlsbad comments (Letter L3) and provides an opinion of how future aircraft operations should be quantified and attributable to air quality emissions. The comment asserts the PEIR's analysis is disproportionate to aircraft operations, and requests the County to demonstrate why the PEIR's published analysis is credible and to disclose how the County's analysis is in error.

Please refer to **Response to Comment L3-88** for a response to the City of Carlsbad on this topic. Aircraft emissions were based on the fleet mix and operational activity presented in the Master Plan Update, which was included in PEIR's Appendix F–Air Quality Impact Technical Report, Table 16. These fleet mix inputs were entered into the most current FAA-approved model, Aviation Environmental Design Tool (AEDT version 2d), where the inputs and default emission factors (specific to each aircraft type) were used to calculate annual emissions for the existing and future scenarios. Appendix B of the Air Quality Impact Technical Report provides further detail, including the emission factors for each aircraft type. Therefore, the analysis previously disclosed in the published PEIR is appropriate and does not require revision.

- I75-263** The comment asserts that recalculations of air quality emissions are warranted and would result in significant impacts requiring mitigation. The commenter asserts the analysis is deficient and must be recirculated for public review. Lastly, the comment requests the County explain how the PEIR fairly discloses air quality principles, relevant facts, and a proper model.

Regarding cumulative projects, no revisions to the PEIR were made as noted in **Response to Comments I75-229 and I75-260**. Also, please refer to **Response to Comment I75-262**, which explains the air quality model and how the analysis was performed. Regarding the model, please refer to the published PEIR Appendix F–Air

Quality Impact Technical Report. Appendix A of this technical report (CalEEMod Results and Assumptions) does include the modeling input information.

I75-264 Please refer to **Master Response 10 (Program-level vs Project-level Analysis)**.

I75-265 This comment states that the commenter adopts and incorporates by reference the City of Carlsbad comments on the Master Plan Update and PEIR. For a discussion of comments provided by the City of Carlsbad, please refer to **Response to Comments L3 and R-L3**.

I75-266 The comment requests information pertaining to existing conditions of the Airport's operation, and the comment does not specifically identify an environmental issue with the PEIR analysis. Therefore, no changes to the PEIR have been made in response to this comment, and no further response is required. Regarding RWQCB Order 96-13, please refer to **Response to Comment I75-5**.

I75-267 Please refer to **Master Response 5 (Airport Expansion / Public Vote)** as well as **Response to Comments I75-27 and I75-28**. No changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

I75-268 The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-269 The commenter raises two separate issues in this comment. As it pertains to the County's position on the applicability of the County and City of Carlsbad land use authorities at the Airport, please see **Response to Comments I75-27 and I75-28**. Also see **Master Response 5 (Airport Expansion/Public Vote)**.

As it pertains to the Airport's former classification, the comment confuses an obsolete classification for the Airport with its designation in the National Plan of Integrated Airport System based on the use of "general aviation" terms under both systems. The two are not related. As discussed in Section 3.1.7.1.2 of the PEIR, the FAA replaced the system that applied the "general aviation basic transport" designation with the Airport Reference Code (ARC) system that primarily looks at approach speed and airframe dimensions to develop airfield design criteria.

No changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

I75-270 For discussion of Carlsbad Municipal Code Section 21.53.015, please see **Master Response 5 (Airport Expansion/Public Vote)**.

I75-271 Table 4-1 in Chapter 4, Alternative, uses the "check and X marks" style table which is typical in CEQA analysis to easily show if project alternatives would achieve a specific project objective. As stated in Section 15126.6 of the CEQA Guidelines, "The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or

more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed project. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.” Therefore, the alternatives analysis within the PEIR is adequate according to the CEQA Guidelines. No revisions to the PEIR have been made in response to this comment.

I75-272 This comment expresses the commenter’s support of the No Project Alternative over the proposed project. The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

I75-273 The PEIR Section S.5.2, which summarizes the B-II Enhanced Alternative, states that EMAS would be installed on the runway’s western end. This is also confirmed in PEIR Figure 4-1. Potential impacts were discussed to the inactive landfill under the B-II alternative since the runway extension would occur over Unit 3 of the inactive landfill. Therefore, this alternative’s impacts due to hazards and hazardous materials would be comparable to the Proposed Project. The remainder of this comment includes a request for information, and it does not specifically identify an environmental issue with the PEIR analysis.

I75-274 The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required.

I75-275 PEIR Chapter 4 (Alternatives) is not the appropriate place in the PEIR to analyze the Proposed Project, as that analysis has already occurred in Chapter 2, Significant Environmental Effects of the Proposed Project, and Chapter 3, Environmental Effects Found Not to be Significant. However, for each alternative the PEIR includes an analysis of each alternative compared to the Proposed Project, which easily shows the difference in impacts to the reader. The remainder of the comment provides opinion on the design of the Master Plan Update, which does not raise issues with the accuracy or adequacy of the environmental analysis of the PEIR. No further response is required.

I75-276 Please refer to **Master Response 10 (Program-level vs. Project-level Analysis)**.

I75-277 Regarding navigational lighting systems, please refer to **Response to Comment I75-184**. Regarding RPZs, please refer to **Master Response 11 (Runway Protection Zones)**; however, the potential shift in RPZs identified on the final Airport Layout Plan would not consistent an environmental impact due to the Proposed Project. The comment also includes a request for information pertaining to foreseeable property acquisitions. Please refer to **Response to Comment I75-176**.

Regarding Table 4-1, the comment asks the County to explain why two specific alternatives were marked as acceptable for environmental compliance. To clarify, the PEIR does not contain a “D-III Standards Compliance Alternative” as cited by the

commenter. The County presumes the comment meant the Proposed Project (i.e., D-III *Modified Standards Compliance Alternative*). Nonetheless, all project alternatives would strive to minimize environmental impacts; therefore, all but one project alternative was found to meet this project objective. The remainder of the comment cites specific CEQA resources, which have been addressed elsewhere in these responses to the commenter.

- I75-278** This comment states that it incorporates all preceding comments but in the context of the D-III On-Property Alternative. Please refer to **Response to Comment I75-277**.
- I75-279** This comment states that it incorporates all preceding comments but in the context of the C-III Modified Standards Compliance Alternative. Please refer to **Response to Comment I75-277**.
- I75-280** The term Proposed Project is referring to the project that is discussed in Chapter 1, Project Description, Locations, and Environmental Setting, and is analyzed in Chapter 2, Significant Environmental Effects of the Proposed Project, and Chapter 3, Environmental Effects Found Not to be Significant. However, for each alternative the PEIR includes an analysis of each alternative compared to the Proposed Project, which easily shows the difference in impacts to the reader. No revisions to the PEIR have been made in response to this comment.
- I75-281** In accordance with Section 15126.6 of the CEQA Guidelines, if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives”. Since the No Project Alternative was first identified as the environmentally superior alternative, CEQA mandates that the PEIR identify the next environmentally superior alternative from the remaining project alternatives. In this case, that alternative is the D-III Modified Standards Compliance alternative. No revisions have been made to the PEIR in response to this comment.
- I75-282** Please refer to **Master Response 10 (Program-level vs. Project-level Analysis)**.
- I75-283** The conclusion comments are noted. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project, and no further response is required.